

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, CO 80202	
THE PEOPLE OF THE STATE OF COLORADO, v. ALEXIS GUSTAVO GARIBO-MERAZ LUIS ENRIQUE VILLANUEVA-GONZALEZ JOSE ARMANDO LUZANIA-MARTINEZ JOSE MADRID-TREVIZO LUIS ALVERTO RODRIGUEZ-REYNA YUREN ZAMARRON MARQUEZ RAYMUNDO MEDRANO-MADRID Defendants.	<p style="text-align: center;">▲ COURT USE ONLY ▲</p> <p>Grand Jury Case No.: 24CR001</p> <p>Ctrm: 259</p>
COLORADO STATE GRAND JURY INDICTMENT	

COUNT ONE COCCA – PATTERN OF RACKETEERING – PARTICIPATION IN AN ENTERPRISE; §§ 18-17-104(3) AND 18-7-105, C.R.S. [F2] **37284**

COUNT TWO COCCA – CONSPIRACY; §§ 18-17-104(4) AND 18-17-104(3), C.R.S. [F2] **37285**

COUNT THREE AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000,C.R.S. 18-4-409(2),(3)(A) [F5] **080AG**

COUNT FOUR ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 [F4] **24051**

COUNT FIVE FORGERY OF A GOVERNMENT ISSUED DOCUMENT, C.R.S. 18-5-102(1)(E) [F5] **1001E**

COUNT SIX AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000, C.R.S. 18-4-409(2),(3)(A.5) [F4] **0804H**

COUNT SEVEN AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000,C.R.S. 18-4-409(2),(3)(A) [F5] **080AG**

COUNT EIGHT THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] **08A15**

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<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, CO 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v.</p> <p>ALEXIS GUSTAVO GARIBO-MERAZ</p> <p>LUIS ENRIQUE VILLANUEVA-GONZALEZ</p> <p>JOSE ARMANDO LUZANIA-MARTINEZ</p> <p>JOSE MADRID-TREVIZO</p> <p>LUIS ALVERTO RODRIGUEZ-REYNA</p> <p>YUREN ZAMARRON MARQUEZ</p> <p>RAYMUNDO MEDRANO-MADRID</p> <p>Defendants.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>PHILIP J. WEISER, Attorney General JOHN STOCKLEY, Senior Assistant Attorney General* 1300 Broadway, 9th Floor Denver, Colorado 80203 (720) 508-6700 Registration Number: 52496 *Counsel of Record</p>	<p>Grand Jury Case No.: 24CR001</p> <p>Ctrm: 259</p>
<p>COLORADO STATE GRAND JURY INDICTMENT</p>	

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COUNT ONE

**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT—
PARTICIPATION IN AN ENTERPRISE—PATTERN OF RACKETEERING, C.R.S. § 18-17-
104(3) [F2] 37284**

Between and including October 1, 2021 and May 24, 2024, in the State of Colorado, **Alexis Gustavo Garibo-Meraz, Luis Enrique Villanueva-Gonzalez, and Jose Armando Luzania-Martinez**, while employed by or associated with an enterprise as defined by § 18-17-103(2), C.R.S., as amended, namely: a group of individuals associated in fact, although not a legal entity, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in the enterprise through a pattern of racketeering activity; in violation of sections 18-17-104(3) and 18-17-105, C.R.S.

COUNT TWO

**VIOLATION OF THE COLORADO ORGANIZED CRIME CONTROL ACT—
PARTICIPATION IN AN ENTERPRISE—CONSPIRACY, C.R.S. § 18-17-104(4) [F2] 37285**

Between and including October 1, 2021 and May 24, 2024, in the State of Colorado, **Alexis Gustavo Garibo-Meraz, Luis Enrique Villanueva-Gonzalez, and Jose Armando Luzania-Martinez**, did unlawfully, feloniously, and knowingly conspire or endeavor to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of section 18-17-104(4) and 18-17-104(3), C.R.S.

The offenses alleged in Counts One and Two were committed in the following manner:

THE ENTERPRISE

The enterprise alleged in Counts One and Two is a group of individuals, associated in fact, although not a legal entity. The enterprise included, but was not limited to, the following: Alexis Gustavo Garibo-Meraz (“Garibo”), Luis Enrique Villanueva-Gonzalez (“Villanueva”), Jose Armando Luzania-Martinez (“Luzania”), Jose Maria Madrid-Trevizo (“Jose Madrid”), Luis Alverto Rodriguez-Reyna (“Reyna”), Yuren Zamarron-Marquez, Raymundo Medrano-Madrid (“Raymundo Madrid”), Luis Eduardo Perez-Munoz (“Lalo”), Daniel Eduardo Romo, Brayen Rueben Ruiz-Flores, Jorge Luis Garcia-Chavez, Antonio Galaviz-Escarcega, Hugo Eduardo Benitez Gonzalez, Mauricio Flores Castro, “Rimon,” and Greg Mario Delgado, and other persons known and unknown, who were associated from time to time in racketeering activity that was related to the conduct of the enterprise.

The enterprise consists of the people identified above working in concert with each other and, at times, with other parties of known or unknown identity between October 2021 and May 2024 throughout Mesa and Garfield Counties in Western Colorado, as well as adjacent areas of Utah. The purpose of the enterprise focused generally on thefts of motor vehicles, primarily full-sized pickup trucks, and Off Highway Vehicles (“OHVs”) from mostly private parties.

While some trucks and OHVs were used as personal transportation for the members of the enterprise, the primary function of the enterprise was to steal a vehicle, legitimize the stolen vehicle through means of Vehicle Identification Number (“VIN”) swapping or cloning, and then sell the stolen vehicle to a third party for a profit and to the benefit of the members. VIN swapping involved the members of the enterprise locating and procuring a vehicle of similar make and model to a stolen vehicle, either before, after or contemporaneous to the theft of the vehicle. Importantly, in locating these “donor” vehicles, the members of the enterprise did not attempt to obtain complete vehicles and/or functioning vehicles. The primary function of the donor vehicle was to provide a VIN to ultimately procure a title and conceal the identity of the stolen vehicle. To that end, members of the enterprise frequently attempted to obtain truck cabs, dashboards, gloveboxes, or mechanically inoperable vehicles for the sole purpose of utilizing those vehicle’s VINs, VIN plates, and VIN stickers. Members of the enterprise frequently paid low prices for these donor vehicles and/or donor parts given their condition as not road-worthy vehicles.

Once the members of the enterprise had a donor vehicle, they would obtain a title using the donor vehicle’s VIN through the Colorado Department of Revenue, Division of Motor Vehicles. The VIN corresponding to the donor vehicle would then be affixed to the stolen vehicle in multiple locations through various methods, *e.g.* fraudulent VIN plates, VIN stickers, and NADER labels. Combined with a seemingly valid Colorado state title, the stolen vehicle displaying the fraudulent VIN would appear legitimate to potential buyers. The members of the enterprise would then profit by selling the stolen vehicle to a third-party buyer unaware of the stolen status of the vehicle. Indeed, many of the vehicles discussed below were recovered from third-party buyers through searches of titles issued to the primary suspects.

Members similarly engaged in VIN cloning, which involves a process of concealing the identity of the stolen vehicles with a VIN obtained through a public search. In this case, the most common source of cloned VINs were auction websites for totaled and/or salvaged vehicles. The members could search online auction websites for the VIN of a similar make and model of the stolen vehicle, or vehicle anticipated to be stolen. In most instances, the vehicles shown on these auction websites were severely damaged. The VIN obtained from the auction website would then be used to obtain title and duplicated onto the stolen vehicle, to legitimize the vehicle for purposes of sale to a third party.

Similar methods of VIN swapping and cloning were utilized by members of the enterprise to conceal the identities of stolen OHVs. The titling process for OHVs differed in that it was affected through the Colorado Division of Parks and Wildlife. The result was the same—to make a stolen OHV appear legitimate for the purpose of selling to a third party for the benefit of the members of the enterprise.

Significantly, the efforts of the members of the enterprise to conceal the identities of the stolen vehicles delayed the recovery of the vehicles and the discovery of their illicit activities. In addition to VIN swapping and cloning, members frequently altered the appearance of stolen

vehicles, either by the application of decals, the removal of decals or badging, removal or adding after-market parts, wheels, or rims, or the display of license plates and temporary license plates not legitimately associated with the vehicle. Members used some stolen vehicles as personal vehicles for daily driving for extended periods of time.

During all times relevant to this indictment, the members of the enterprise maintained on-going social relationships outside of their racketeering activity, including frequent and on-going communications. Members used a variety of digital methods to communicate and document social activities, including but not limited to social media platforms, such as Facebook, text messages, and cellular communications devices. Garibo's iCloud account and cellular devices contained numerous photos of the members of the enterprise, including Garibo, Villanueva, and Luzania, socializing, recreating, traveling, and riding in vehicles, *etc.*

During times relevant to this indictment, Villanueva and Luzania resided at an apartment at 200 Colorado Avenue, apartment #4307, in Parachute, Colorado. Garibo utilized this same address to register, co-register, and/or title multiple vehicles with both Villanueva and Luzania. Garibo also provided rental furniture and other services for that residence.

Garibo, Villanueva, and Luzania all rented storage units and vehicle spaces at the same storage facilities in Rifle, Colorado. The manager of one of these storage facilities described that Garibo and Villanueva would often pay each other's bills and if they were unable to reach one, they would contact the other, *e.g.* if the manager were unable to contact Garibo, she would contact Villanueva. During an interview Garibo reported that Villanueva worked for him briefly at his cabinet making shop.

Members fulfilled varying and alternating roles within the enterprise, including procuring donor vehicles for the purpose of obtaining their VIN, stealing vehicles, obtaining titles, storing stolen vehicles, and altering stolen vehicle's VINs and appearances. A purpose of the enterprise was to maintain the members' lifestyle and their continued ability to commit illicit activities, and to conceal and/or delay discovery of their illicit activities. While some members of the enterprise engaged in unrelated legitimate employment, illicit activity appeared to be a significant source of the members' financial support given the frequency and repetitive nature of their thefts.

Members of the enterprise working in concert with each other and/or with persons known and unknown to the Grand Jury, stole an estimated forty-four (44) vehicles, including motor vehicles, trailers, and OHVs from Colorado, Utah, and Oklahoma, with a total aggregate value in excess of \$870,000 between October 2021 and May 2024.

PATTERN OF RACKETEERING ACTIVITY

Alexis Gustavo Garibo-Meraz (“Garibo”), Luis Enrique Villanueva-Gonzalez (“Villanueva”), Jose Armando Luzania-Martinez (“Luzania”), Jose Maria Madrid-Trevizo (“Jose Madrid”), Luis Alverto Rodriguez-Reyna (“Reyna”), Yuren Zamarron-Marquez, Raymundo Medrano-Madrid (“Raymundo Madrid”), Luis Eduardo Perez-Munoz (“Lalo”), Daniel Eduardo Romo, Brayan Rueben Ruiz-Flores, Jorge Luis Garcia-Chavez, Antonio Galaviz-Escarcega, Hugo Eduardo Benitez Gonzalez, Mauricio Flores Castro, “Rimon,” and Greg Mario Delgado, and others known and unknown to the Grand Jury, directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, including any lesser offenses, related to the conduct of the enterprise, with at least one of which took place in the State of Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

Theft, § 18-4-401
Motor Vehicle Theft, § 18-4-409
Forgery § 18-5-102
Attempt to Influence a Public Servant § 18-8-306

RACKETEERING ACTIVITY

The acts of racketeering activity that the above-named persons committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following predicate acts, all identified as counts listed below, including any lesser included offenses: Uncharged Acts of Racketeering A through C; and Count Three through Count Fifty-One are alleged as predicate acts for Counts One and Two. In addition, the offenses alleged in Counts One and Two were committed in the manner described immediately below and described in the factual summaries in support of the following Uncharged Acts of Racketeering and Counts, incorporated by reference herein.

UNCHARGED ACT OF RACKETEERING A
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN
\$20,000,C.R.S. 18-4-409(2),(3)(A) [F5] 080AG
(Grand Jury Exhibit 2, Slide 14)

Between and including February 15, 2022 and February 16, 2022, and discovered on or after September 7, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of _____, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

UNCHARGED ACT OF RACKETEERING B
AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN
\$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 080AG
(Grand Jury Exhibit 2, Slides 15-16)

Between and including February 15, 2022 and February 16, 2022, and discovered on or after September 7, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of _____, without authorization, or by threat or deception, and caused five hundred dollars or more property damage, including but not limited to property damaged to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of the motor vehicle, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

The material facts in support of Uncharged Acts of Racketeering A and B are as set forth below.

Between 9:00 p.m. on February 15, 2022, and 4:00 a.m. on February 16, 2022, _____'s white 2001 Dodge Ram 3500 truck, _____, valued at \$15,000, was stolen from Grand Junction, _____, Mesa County, Colorado. To date, _____'s vehicle has not been located or recovered.

Following a traffic stop on September 7, 2023, investigators developed investigative leads which ultimately lead to the seizure of cell phones from Garibo and other suspects. Investigators located multiple photos of a truck consistent with _____'s stolen vehicle on Garibo's phone. Importantly, these photos are dated June 27, 2022, after the date of the theft, and in one photo the Colorado license plate _____ is visible and still affixed to the truck.

Also, between 4:00 p.m. on February 15, 2022, and 5:20 a.m. on February 16, 2022, _____'s red 2004 Chevrolet Silverado truck, _____, Colorado state license plate _____, valued at \$5,900, was stolen from _____ Grand Junction, _____, Mesa County, Colorado. Later, on February 16, 2022, officers later recovered _____'s vehicle at _____ – the theft location of _____'s vehicle described immediately above. At the time of recovery, officers noted that the ignition was punched and the steering column was removed. Witnesses at the recovery location described the arrival of _____'s vehicle, and “suspects” leaving the red Chevrolet Silverado and stealing _____'s Dodge Ram. While witnesses reported that residential door bell cameras recorded the arrival and theft, video was not collected. Responding officers processed _____'s vehicle for any items of evidentiary value for later forensic testing. (See Grand Jury Transcript, January 16, 2025, pages 115-122.)

UNCHARGED ACT OF RACKETEERING C
MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 2, Slides 42-44)

Between and including December 16, 2022 and August 20, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or remove or altered or removed the vehicle identification number, and/or and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The material facts in support of Uncharged Act of Racketeering C are as set forth below.

On or about December 16, 2022, _____'s black 2019 Ford Velociraptor by Hennessey truck, _____, Colorado license plate _____, valued at \$53,478, was stolen from its last parked location at Denver International Airport, 8511 Pena Boulevard, City and County of Denver, 80249, Colorado. This vehicle was stolen in the same general time frame and from the same location as _____'s Ford Raptor, discussed below. _____'s Ford Raptor truck was also stolen from the Denver area one day prior, also discussed below.

Law enforcement subsequently recovered _____'s Ford Velociraptor on or about August 20, 2023, in Thornton, Colorado. At the time of recovery, _____'s vehicle publicly displayed _____ and a Chihuahua Mexico license plate, _____. Investigators researched the source of this VIN, and discovered the same belonging to a totaled/salvaged pickup truck listed on an auction website for sale for \$7,000, and located in Mebane, North Carolina. Based on the photo on the website, the vehicle with the VIN ending _____ appeared to be damaged by fire.

Investigators located numerous photos on Garibo's cell phone, devices, and subscriber accounts consistent with both _____'s stolen vehicle and the time period it was stolen and missing. Officers reviewed a video from Garibo's iCloud account dated May 19, 2023. The video appears to be taken from the driver's side of the interior of a truck which is following a black Raptor truck matching the description of _____'s truck. Importantly, the truck the driver is following in the video displays an unidentified Chihuahua license plate, consistent with the same type of plate recovered from _____'s vehicle three months later. Based on his extensive reviews of the contents of Garibo's digital devices and accounts, Investigator _____

believed that the person filming and driving was Garibo. A photo from Garibo's iCloud account dated June 1, 2023, shows a VIN sticker with the VIN ending _____. A second photo from Garibo's iCloud account dated June 1, 2023, shows a Hennessey model black pick-up truck consistent with _____'s stolen vehicle. In this photo, a Chihuahua license plate is partially

visible as affixed to the rear bumper. (See Grand Jury Transcript, January 16, 2025, pages 181-186.)

COUNT THREE

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN

\$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 080AG

(Grand Jury Exhibit 2, Slides 2-5; Grand Jury Exhibit 2A, Slides 2-3)

Between and including October 1, 2021 and September 22, 2023, and discovered on or after September 22, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of _____, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours and/or attempted to alter or remove or altered or removed the vehicle identification number, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

COUNT FOUR

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 [F4] 24051

(Grand Jury Exhibit 2, Slides 2-5; Grand Jury Exhibit 2A, Slides 2-3)

On or about May 12, 2022, and discovered on or after September 22, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully and feloniously attempted to influence _____, a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT FIVE

FORGERY OF A GOVERNMENT ISSUED DOCUMENT, C.R.S. 18-5-102(1)(E) [F5] 1001E

(Grand Jury Exhibit 2, Slides 2-5; Grand Jury Exhibit 2A, Slides 2-3)

On or about May 12, 2022, and discovered on or after September 22, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, with the intent to defraud _____, and/or _____, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which was purported to be, or which was calculated to become or to represent if completed, a written instrument, namely: an Application for Colorado Certificate of Title for Motor Vehicle, officially issued or created by Colorado Department of Revenue, Division of Motor Vehicles and/or _____, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The offenses alleged in Counts 3 through 5 were committed in the following manner:¹

Between October 1, 2021 and October 2, 2021, _____'s maroon 2007 Chevrolet Silverado 2500 truck, _____, Colorado license plate _____, valued at \$12,309, was stolen from _____ Grand Junction, Mesa County, Colorado.

On or about December 20, 2021, Alexis Gustavo Garibo-Meraz ("Garibo") purchased a truck from _____ of Fort Collins, Colorado, for \$1500. The truck purchased by Garibo from _____ had a VIN _____.

On or about May 12, 2022, Garibo applied for a new title for a 2005 Chevrolet Silverado HD using the VIN ending in _____ from the truck purchased from _____. Garibo completed the Application for Colorado Certificate of Title for Motor Vehicle with Colorado Department of Revenue, Division of Motor Vehicles ("DMV") Agent _____ at that agency's office in Rifle, Garfield County, Colorado. On the application, Garibo listed his residence as _____, Parachute, Colorado.

On or about February 6, 2023, Garibo sold a Chevrolet Silverado truck to _____ of _____ Holyoke, _____ Phillips County, Colorado. _____ described the seller as an older male named "Chapo," and reported that he provided an undetermined amount of cash and another pickup in exchange for the vehicle. Garibo transferred a paper title to _____ for a vehicle with the VIN ending _____. The title listed Garibo as the seller, and _____ as the buyer.

In September 2023, investigators conducting a title search on vehicles associated with Garibo discovered the sale between Garibo and _____. Thereafter, on or about September 22, 2023, investigators went to _____, Holyoke, Phillips County, Colorado to inspect the vehicle purchased by _____. The truck in _____'s possession displayed a public facing VIN label (in the windshield) displaying the VIN ending _____. In addition, the glovebox VIN label displayed the VIN ending _____. _____ had also obtained a State of Colorado Certificate of Title with the VIN ending _____ and at the time of inspection displayed Colorado state license plate _____. Both the public facing windshield VIN and the glovebox VIN label appeared fraudulent and not factory applied. Through locating the confidential/second VINs, investigators identified the truck in _____'s possession as _____'s Chevrolet Silverado. (See Grand Jury Transcript, January 16, 2025, pages 85-95; March 6, 2025, pages 6-12.)

¹ The factual basis of the charges (and all other charges) in the indictment includes but is not limited to the factual summaries articulated herein. All factual summaries contained pertaining to individual counts in this indictment are incorporated by reference here to all other counts.

COUNT SIX

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - \$20,000-\$100,000,
C.R.S. 18-4-409(2),(3)(A.5) [F4] 0804H

(Grand Jury Exhibit 2, Slides 6-7; Grand Jury Exhibit 2A, Slide 4)

Between and including October 19, 2021 and November 8, 2021, and discovered on or after September 14, 2023, in the State of Colorado, **Luis Enrique Villanueva-Gonzalez** and **Raymundo Medrano-Madrid**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of _____, without authorization, or by threat or deception and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or remove or altered or removed the vehicle identification number, and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was twenty thousand dollars or more but less than one hundred thousand dollars; in violation of section 18-4-409(2),(3)(a.5), C.R.S.

The offense alleged in Count 6 was committed in the following manner:

On or about October 19, 2021, _____'s white 2005 Chevrolet Silverado 3500 truck, VIN _____, Colorado license plate _____, valued at \$36,905, was stolen from _____, Clifton, _____ Mesa County, Colorado. _____'s surveillance system recorded the theft of his vehicle. _____'s daughter was inside the residence at the time of the theft and heard the vehicle's engine start. She contacted her father, who looked at his surveillance system and observed two males participating in theft in his driveway, one who acted as a "lookout" and one who entered the vehicle then stole the truck.

On or about November 8, 2021, Weld County Sheriff's officers recovered _____'s vehicle abandoned in a field at _____, in Weld County, Colorado. At the time of recovery, the vehicle displayed a VIN _____ and a Colorado temporary tag _____. Investigators positively identified the vehicle as Markuson's using an onboard diagnostic device to identify the true VIN, and neither the VIN nor the temporary tag displayed belonged to the Silverado.

Investigators researched the VIN ending _____ and determined that it belonged to a yellow Chevrolet truck previously owned by the Colorado Schooling Service in Silt, Colorado. Investigators contacted the owner of the Colorado Schooling Service who reported that he had previously sold the cab only of that truck on or about October 14, 2021, to a Hispanic male. At the time of the sale, the Hispanic male was accompanied by a second male. The owner of the Colorado Schooling Service reported that the behavior of the two males at the time of the sale on October 14, 2021, was suspicious, and therefore he took photos of the men, which he thereafter

provided to investigators. The two men used a trailer to load and retrieve the Colorado Schooling Service truck's cab. Notably, one of the males, who stood at the rear of a Dodge truck used to transport the Colorado Schooling Service truck cab, wore a similar coat and hat, and appeared to be the same male who was the "lookout" during the theft.

The photos obtained from the Colorado Schooling Service were also shown to witness on September 14, 2023, and Garibo on September 20, 2003. Both identified the male standing at the rear of the Dodge truck in the photos as Luis Enrique Villanueva-Gonzalez ("Villanueva"). Colorado State Patrol Investigator [redacted] is also familiar with Villanueva and identified him in the surveillance video and photos. Investigators also positively identified Raymundo Medrano-Madrid in the surveillance video and photos. (See Grand Jury Transcript, January 16, 2025, pages 95-103; March 6, 2025, pages 12-14.)

COUNT SEVEN

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN

\$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 080AG

(Grand Jury Exhibit 2, Slides 8-9; Grand Jury Exhibit 2A, Slide 5)

Between and including January 29, 2022 and February 3, 2022, and discovered on or after October 16, 2023, in the State of Colorado, **Luis Enrique Villanueva-Gonzalez**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of [redacted], without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours and/or caused five hundred dollars or more property damage, including but not limited to property damage to the motor vehicle involved, in the course of obtaining control over or in the exercise of control of the motor vehicle, and/or [redacted] and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

The offense alleged in Count 7 was committed in the following manner:

On or about January 29, 2022, [redacted]'s white 2007 GMC Sierra 1500 truck, VIN [redacted], Colorado state license plate [redacted], valued at \$7,471, was stolen from the residence of [redacted] at [redacted] Grand Junction, [redacted], Mesa County, Colorado. [redacted] is an employee of [redacted], a company owned by [redacted] and was using the company's vehicle. Surveillance cameras at [redacted]'s home did not activate at the time of the theft, and it's possible that suspect used devices to interfere with wireless communications systems.

Law enforcement recovered [redacted] s GMC Sierra on or about February 3, 2022, at Garfield CR 246 and Interstate 70 in Rifle, Garfield County, Colorado. At the time of recovery, the vehicle displayed a Colorado plate [redacted] and was missing tires and rims. Investigators determined that the plate on [redacted] s truck was registered to [redacted] of Denver, Colorado.

Investigators processed [redacted] s vehicle for any items of evidentiary value and recovered an energy drink can from the center cup holder. This drink can was subjected to forensic testing, and on or about October 16, 2023, a DNA profile from the can positively compared or matched to a known DNA profile of Luis Enrique Villanueva-Gonzalez. (See Grand Jury Transcript, January 16, 2025, pages 103-107; March 6, 2025, pages 14-15.)

COUNT EIGHT

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A15

(Grand Jury Exhibit 2, Slides 10-13, Grand Jury Exhibit 2A, Slides 6-8)

On or about January 29, 2022, and discovered on or after October 20, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Luis Enrique Villanueva-Gonzalez**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2014 black Echo Utility Trailer, a 2020 black Can-Am Outlander OHV, and a 2014 gray Can-AM Outlander OHV of [redacted], with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive [redacted] permanently of their use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offense alleged in Count 8 was committed in the following manner:

Between January 29, 2022 and January 30, 2022, [redacted] s black 2014 Echo Utility Trailer, VIN [redacted], Colorado state license plate [redacted], valued at \$2,000, was stolen from [redacted], Grand Junction, [redacted], Mesa County, Colorado. At the time of the theft, [redacted] s trailer had two OHVs owned by [redacted] loaded onto it that were also stolen: a black 2020 Can-Am Outlander OHV, VIN [redacted], valued at \$10,123 and a gray 2014 Can-Am Outlander OHV, VIN [redacted], valued at \$9,800. Notably, the location of the theft of [redacted] s trailer and OHVs was 1.3 miles away from the location of the theft of [redacted] s GMC Sierra from the [redacted] residence that same night. See Count 7, above, incorporated by reference herein. To date, neither [redacted] s trailer nor her OHVs have been recovered.

On or about October 20, 2023, investigators executed a search warrant at a storage unit leased by Garibo from Aardvark Storage, , Garfield County, Colorado. During the search of Garibo’s storage unit, investigators located a partial VIN sticker that appeared cut or damaged displaying “ ,” i.e. the VIN for ’s previously stolen 2020 Can-Am Outlander OHV.

The manager of that facility reported that Garibo and Villanueva often paid each other’s storage unit fees. Further, if the manager was unable to reach one of the two, she would contact the other. The manager described that after two different stolen OHVs were recovered from Villanueva’s unit (across the street), Villanueva was evicted. Following his eviction, the manager found vehicle parts and a hydraulic crane that could be used to remove engines, which she then disposed of. (See Grand Jury Transcript, January 16, 2025, pages 107-115; March 6, 2025, pages 15-16.)

COUNT NINE

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(G) [F5] 08A14
(Grand Jury Exhibit 2, Slides 17-19, Grand Jury Exhibit 2A, Slide 9)

On or about March 1, 2022, and discovered on or after September 8, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: 2017 Silver J&L’s Cargo Express Trailer of and , with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive] and . permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offense alleged in Count 9 was committed in the following manner:

On or about March 1, 2022, between 6:00 a.m. and 3:00 p.m., and ’s 2017 Silver J&L’s Cargo Express trailer, VIN , Colorado state license plate , valued at \$7,000, was stolen from , Grand Junction, , Mesa County, Colorado. At the time of the theft, the trailer contained a 2012 Arctic Cat ATV. To date, neither the trailer nor its contents have been recovered.

On or after September 8, 2023, investigators seized Garibo’s phone. As a result of processing the contents of the phone, investigators located multiple photos and video of a trailer consistent with the trailer stored as either phone contents or in an iCloud account associated with Garibo. A photo dated June 14, 2022, depicts the reflection in the sideview mirror of a distinctive Ford F-250 pickup truck associated with Garibo. The photo appears to be

taken from the driver's side of the vehicle, showing the truck towing a trailer as reflected in sideview mirror. Importantly, the trailer is black with a distinctive "Cargo Express" sticker/decals and diamond plated fender – consistent with the previously stolen trailer. In a video also dated June 14, 2022, the video shows a Cargo Express trailer consistent with the trailer hooked to Garibo's known Ford F-250 truck in front of a residence associated with Garibo. The video pans to the location on the trailer where VIN labels would normally appear (on the right side in front of the trailer wheels), and it appears the labels have been removed. Investigators also located a video and a photograph on Garibo's iCloud account, both dated October 19, 2022, of VIN labels " , " i.e. the VIN of the trailer. Based on the October 19, 2022 photo and video it is unclear what vehicle the labels are attached to. (See Grand Jury Transcript, January 16, 2025, pages 122-130; March 6, 2025, pages 16-17.)

COUNT TEN

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A1G
(Grand Jury Exhibit 2, Slides 20-24, Grand Jury Exhibit 2A, Slides 10-11)

Between and including April 26, 2022 and December 1, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz, Luis Enrique Villanueva-Gonzalez, and Jose Armando Luzania-Martinez**, unlawfully, feloniously, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2021 tan, black and orange Polaris RZR Turbo OHV, of , with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offense alleged in Count 10 was committed in the following manner:

On or about April 26, 2022, 's tan, black, and orange 2021 Polaris RZR Turbo OHV, VIN , valued at \$30,000, was stolen from , Grand Junction, , Mesa County, Colorado. provided surveillance camera footage to the investigators that showed two male suspects involved in the theft of his Polaris OHV. Based on the footage, investigators later identified Luis Enrique Villanueva-Gonzalez as one of the males that participated in the theft of 's OHV, specifically seated in the driver's seat of the OHV during the theft. Notably, 's OHV was distinct in several ways, including its tan, orange and black color scheme and custom grill.

Following a traffic stop on September 7, 2023, investigators developed investigative leads which ultimately lead to the seizure of cell phones from Garibo and other suspects.

Devices associated with Alexis Gustavo Garibo-Meraz and Jose Armando Luzania-Martinez contained photos of an OHV consistent with [redacted]'s stolen Polaris RZR. A photo dated May 14, 2022, from Garibo's device depicts a suspect identified as Luzania removing a grill from a tan, black, and orange OHV. [redacted] later reviewed the photo and identified his Polaris RZR OHV in the photo based on its distinctive custom grill. Investigators also identified multiple photos of an OHV suspected to be [redacted]'s RZR on Luzania's public facing Facebook account.

On July 18, 2022, Garibo registered a RZR OHV under his name with a VIN ending through Colorado Parks and Wildlife. Garibo's phone contained a photo dated July 17, 2022, showing a handwritten "bill of sale" for a RZR with VIN ending [redacted]; however, the handwritten note stated that Villanueva sold a RZR with VIN ending [redacted] to [redacted]. Garibo's device contained multiple photos of an OHV consistent with [redacted]'s stolen Polaris RZR in June, July and September 2022. Villanueva and Luzania appear in these photos with the RZR as well. Significantly, photos dated June 3, 2022, show the Polaris RZR OHV in a crash, and photos dated thereafter show damage to the vehicle. In text messages recovered from Garibo's device during this timeframe, Garibo admitted to having wrecked the vehicle and estimated that damage to be \$1000.

On May 30, 2023, Garibo sold a RZR OHV, with damage, to [redacted] of [redacted], Rifle, Colorado, for \$1000. In turn, [redacted] sold that RZR OHV to [redacted].

Through a title search of vehicles registered to Garibo, law enforcement located and recovered that RZR OHV on or about December 1, 2023, at [redacted] Rifle, [redacted], Garfield County, Colorado. At the time of recovery, the RZR OHV displayed a VIN [redacted].

The Polaris manufacturer sticker had been removed and the VIN on the driver's side of the frame had been ground off and replaced with a VIN ending [redacted]. Both of these VINs appeared to be crudely applied and not as a manufacturer would affix them to a vehicle. Law enforcement contacted a Polaris mechanic who confirmed the true VIN of the vehicle being inspected and identified the vehicle as [redacted]'s previously stolen Polaris RZR Turbo.

Garibo's devices contained multiple photos of the VIN ending [redacted] fraudulently applied to [redacted]'s Polaris RZR at the time of recovery. A photo dated July 17, 2022, showed the fraudulently applied VIN where the true VIN had been ground off on the driver's side of the frame of [redacted]'s vehicle, as described above at the time of recovery. Garibo's devices also contained screenshots dated July 17, 2022, and September 23, 2022, from auction websites advertising for sale a salvaged Polaris RZR Turbo with the VIN ending [redacted] and photos of that vehicle's frame VIN stickers. (See Grand Jury Transcript, January 16, 2025, pages 130-143; March 6, 2025, pages 17-22.)

COUNT ELEVEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 2, Slides 25-28; Grand Jury Exhibit 2A, Slide 12)

Between and including June 30, 2022 and September 26, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or remove or altered or removed the vehicle identification number; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT TWELVE

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 [F4] 24051
(Grand Jury Exhibit 2, Slides 25-28; Grand Jury Exhibit 2A, Slide 12)

Between and including June 30, 2022 and July 7, 2022, and discovered on or after September 7, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully and feloniously attempted to influence _____, a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT THIRTEEN

FORGERY OF A GOVERNMENT ISSUED DOCUMENT, C.R.S. 18-5-102(1)(E) [F5] 1001E
(Grand Jury Exhibit 2, Slides 25-28; Grand Jury Exhibit 2A, Slide 12)

Between and including June 30, 2022 and July 7, 2022, and discovered on or after September 7, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, with the intent to defraud _____, and/or _____, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which was purported to be, or which was calculated to become or to represent if completed, a written instrument, namely: an Application for Colorado Certificate of Title for Motor Vehicle, officially issued or created by Colorado Department of Revenue, Division of Motor Vehicles and/or _____, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The offenses alleged in Counts 11 through 13 were committed in the following manner:

On or about 9:00 p.m. on June 30, 2022, [redacted]'s white 1997 Dodge Ram 1500 truck, VIN [redacted], Colorado state license plate [redacted], valued at \$2,601, was stolen from his residence at [redacted] Grand Junction, [redacted], Mesa County, Colorado. A license plate reader captured that vehicle and license plate travelling eastbound away from Grand Junction towards the Rifle/Parachute area at approximately 9:24 p.m. that same evening.

Approximately one week earlier, on or about June 22, 2022, [redacted] of Parachute, Colorado sold a green 1997 Dodge Ram, VIN [redacted], to Garibo. [redacted] described the condition of the truck as inoperable with transmission problems. The Certificate of Title listed [redacted] as the seller and Garibo as the buyer, and included a purchase price of \$400.

[redacted] later described to investigators that she sold the green Dodge Ram to a Hispanic male and provided a photograph of the vehicle.

On June 30, 2022, the same date as the theft of [redacted]'s white Dodge Ram, Garibo applied for a title for a 1997 Dodge Ram truck, VIN ending [redacted]. Garibo completed the Application for Colorado Certificate of Title for Motor Vehicle with Colorado Department of Revenue, Division of Motor Vehicles ("DMV") Agent [redacted] at that agency's office in Glenwood Springs, Garfield County, Colorado. Garibo listed the purchase price on the title application as \$400. The title application was subsequently accepted on July 7, 2022.

On or about August 5, 2023, Garibo sold a truck with a VIN ending [redacted] to [redacted] for approximately \$500. In turn, on or about September 17, 2023, [redacted] sold that truck to another buyer, [redacted], of Rifle, Colorado.

In September 2023, investigators conducting a title search on vehicles associated with Garibo discovered the sale between Garibo and [redacted], and traced that vehicle to [redacted]. On September 26, 2023, investigators recovered and inspected the truck in [redacted]'s possession at [redacted], Rifle, Garfield County, Colorado. Importantly, the vehicle was a white Dodge Ram. The public facing VIN, the VIN plate under the hood, and the NADER label of the truck all displayed VIN ending [redacted] (which was associated with Varley's green Dodge Ram). The ignition had been replaced and the driver's door would not lock, consistent with both being forcibly defeated during a prior theft and replaced. The conditions of the VINs described above were also suspicious in that they were not applied as a manufacturer would have affixed them to a vehicle, e.g. the engine VIN plate displaying VIN ending [redacted] lacked rivets. Investigators utilized [redacted] to identify the vehicle in Hauser's possession as [redacted]'s previously stolen Dodge Ram with a legitimate VIN ending [redacted].

Following the recovery of _____'s truck, investigators showed _____ a photo of the recovered vehicle and she confirmed that it was not the vehicle that she had sold to Garibo (with VIN ending _____). Investigators also located photos on Garibo's devices of Garibo holding a removed VIN plate from an unrelated Dodge vehicle, indicating that Garibo had knowledge of where those VIN plates were located and how they could be removed. Garibo's device also contained a photo dated August 5, 2022, of the title issued for the Dodge Ram on July 7, 2022. (See Grand Jury Transcript, January 16, 2025, pages 143-151; March 6, 2025, pages 22-25.)

COUNT FOURTEEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibit 2, Slides 29-32; Grand Jury Exhibit 2A, Slides 13-14)

Between and including September 13, 2022 and November 8, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____ and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and/or attempted to alter or remove or altered or removed the vehicle identification number, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FIFTEEN

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 [F4] 24051

(Grand Jury Exhibit 2, Slides 29-32; Grand Jury Exhibit 2A, Slide 13-14)

On or about November 15, 2022, and discovered on or after November 8, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully and feloniously attempted to influence _____, a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT SIXTEEN

FORGERY OF A GOVERNMENT ISSUED DOCUMENT, C.R.S. 18-5-102(1)(E) [F5] 1001E
(Grand Jury Exhibit 2, Slides 29-32; Grand Jury Exhibit 2A, Slide 13-14)

On or about November 15, 2022, and discovered on or after November 8, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, with the intent to defraud and/or _____, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which was purported to be, or which was calculated to become or to represent if completed, a written instrument, namely: an Application for Colorado Certificate of Title for Motor Vehicle, officially issued or created by Colorado Department of Revenue, Division of Motor Vehicles and/or _____, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The offenses alleged in Counts 14 through 16 were committed in the following manner:

On or about September 13, 2022, _____'s red 2005 Dodge Cummins Ram 2500 truck, VIN _____, Colorado state license plate _____, valued at \$17,070, was stolen from his residence at _____, Grand Junction, _____, Mesa County, Colorado. _____ later told investigators that he heard a diesel truck engine start at approximately 8:30 p.m. that evening.

Following a traffic stop on September 7, 2023, investigators developed investigative leads which ultimately led to the seizure of cell phones from Alexis Gustavo Garibo-Meraz and other suspects. Devices and an iCloud account associated with Garibo as the subscriber contained content and photos of a truck consistent with _____'s Dodge Cummins. For example, investigators located Facebook messages attributed to Garibo dated September 13, 2022, at 6:30 p.m.—the night of the theft—wherein Garibo represented that he was in Grand Junction to “pick a truck.” Investigators located an iCloud photo dated September 17, 2022, of the last eight characters of _____'s vehicle VIN. Notably, the photo appeared to be of the vehicle's engraved confidential VIN location. Investigators located another iCloud photo, dated September 28, 2022, of a vehicle consistent with _____'s Dodge truck at a workplace associated with Garibo. Investigators located a photo of a similar truck on Garibo's Facebook account dated September 29, 2022. Two iCloud photos, both dated October 13, 2022, showed a truck consistent with _____'s vehicle; in one photo, black racing stripes are being applied to the front hood and grill of the truck, and in a second photo, a temporary license plate tag, that registered to Garibo and a VIN ending _____, had been affixed to the truck. Another iCloud photo dated October 16, 2022, showed the truck with the black racing stripes, again parked at a workplace associated with Garibo, and a large Cummins decal attached to the rear window. An iCloud photo dated August 20, 2023, again showed the truck, parked next to a Subaru vehicle associated with Garibo, and now displayed a permanent Colorado state license plate

This plate registered to Garibo is explained in further detail below. Numerous photos on devices associated with Garibo and reviewed by investigators showed Garibo using the truck as his personal vehicle for an extended period.

Officers located a photo on the iCloud account associated with Garibo dated September 16, 2022—three days after the theft of [REDACTED]'s Dodge truck—that showed a vehicle title and insurance card for a vehicle with the VIN ending “ [REDACTED] ”. The insurance card included the names “Ramon Gonzalez” and “Luis Eduardo Perez.” Investigators located “Lalo” as a known alias for Perez. Investigators researched the VIN ending in [REDACTED] and located a 2005 Dodge Ram 2500, originally owned by [REDACTED] of Monte Vista, Colorado. Upon contact, [REDACTED] reported that his truck was in disrepair, and that he had sold the cab and bed of the truck to a local mechanic, [REDACTED], also known as “ [REDACTED] .” [REDACTED] provided photos of a listing for the truck by [REDACTED] that showed that the cab removed from the frame, and other photos showing the cab and bed of the vehicle on the ground at the [REDACTED] property. Stated another way, the Dodge truck with legitimate manufacturer VIN ending [REDACTED] had been reduced to parts and was inoperable.

Investigators reviewing Garibo’s Facebook messages located communications between Garibo and [REDACTED] in June and July 2022. The content of the communications suggested attempts by Garibo to purchase cabs and titles of trucks during that time frame, including Cummins extended cab models. Investigators also reviewed a video from Garibo’s phone dated June 26, 2022, that appeared to show Luis Enrique Villanueva-Gonzalez at [REDACTED]'s mechanic’s yard.

On or about November 15, 2022, Garibo applied for a title for a 2005 Dodge 3500 diesel truck, VIN ending [REDACTED]. Garibo completed the Application for Colorado Certificate of Title for Motor Vehicle with Colorado Department of Revenue, Division of Motor Vehicles (“DMV”) Agent [REDACTED] at that agency’s office in Glenwood Springs, Garfield County, Colorado. Garibo listed a purchase date of September 12, 2022, (one day prior to the theft of [REDACTED]'s vehicle), and a purchase price of \$2000. Garibo listed his address as [REDACTED], Apartment [REDACTED], Parachute, Colorado, [REDACTED]. The title application was accepted that same date.

Garibo’s roommate [REDACTED] reported to investigators that Garibo had offered to sell him his truck. [REDACTED] further described Garibo offering him money to take the vehicle to Mexico away from police. [REDACTED] stated that Garibo had hidden the truck at a friend’s tire shop, where he rented space to store vehicles. On or about November 8, 2023, investigators obtained a search warrant for [REDACTED] at [REDACTED] Silt, Garfield County, Colorado. There officers recovered a red Dodge Ram Cummins truck, displaying Colorado state license plate [REDACTED], which was registered to Garibo, and publicly displaying the VIN ending [REDACTED]. Based on the confidential VIN, investigators identified the vehicle as [REDACTED]'s previously stolen truck.

At the time of recovery, significant modifications had been made to the truck, including black racing stripes, Dodge stickers/decal attached, extended sideview mirrors added, and wheels changed. When investigators showed [redacted] a photo of his vehicle recovered at [redacted], he did not recognize it as the vehicle stolen from his residence given the modifications. A photo on Garibo's Facebook account dated June 8, 2023, showed a truck consistent with [redacted]'s truck at the time of recovery based on these distinctive features and modifications. (See Grand Jury Transcript, January 16, 2025, pages 151-162; March 6, 2025, pages 25-33.)

COUNT SEVENTEEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P **(Grand Jury Exhibit 2, Slides 33-38; Grand Jury Exhibit 2A, Slide 15)**

Between and including December 11, 2022 and September 21, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of [redacted] and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or remove or altered or removed the vehicle identification number, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The offense alleged in Count 17 was committed in the following manner:

Between and including December 11, 2022, and December 13, 2022, [redacted]'s black 2019 Ford F-150 Shelby Raptor truck, VIN [redacted], Colorado state license plate [redacted], valued at \$51,524, was stolen from its last known parked location at Denver International Airport, 8400 Pena Boulevard, City and County of Denver, 80249, Colorado.

On September 8, 2023, officers conducted a traffic stop on a black Ford Raptor driven by Alexis Gustavo Garibo-Meraz in Garfield County, Colorado. At the time of the traffic stop, officers noted several inconsistencies with the public facing VIN and temporary tag displayed on the vehicle. Officers subsequently obtained a search warrant for the vehicle and executed same on September 21, 2023.

At the time of the traffic stop and the execution of the search warrant in September 2023, the vehicle officers contacted Garibo driving publicly displayed the VIN [redacted]. Investigators researched the VIN ending [redacted] and located a public auction website listing showing a black pickup truck with that VIN number for sale in "totaled" condition after an apparent rollover collision. The auction website listed the vehicle for sale for

\$11,000 with “all over” damage. The website listed the vehicle’s location as Dallas, Texas, and indicated that the auction had closed on or about April 18, 2019. Investigators also noted there was no title history for a VIN ending [redacted] in Colorado. Investigators commonly refer to this process of obtaining a fraudulent VIN for stolen vehicle from a publicly available source, such as an auction and/or salvage website as “VIN cloning,” *i.e.* two vehicles may exist with identical VINs but only one was legitimately placed by the manufacturer.

During the search of the vehicle on September 21, 2023, the VIN ending [redacted] appeared on stickers attached at the public and NADER label locations. Comparing the photos of the truck on the auction website to the vehicle inspected that day, the VIN stickers looked different, indicating that the stickers on the searched vehicle were not manufacturer applied. Notably, a photo on Garibo’s device dated August 29, 2023, showed the truck’s VIN sticker ending [redacted] in the same condition as it appeared to investigators when they executed the search warrant on September 21, 2023.

The VIN windshield sticker displaying the VIN ending [redacted] also appeared fraudulent. The coloring, font, and width of the windshield VIN sticker differed significantly from that shown in the photos on the auction website. A VIN sticker on the driver’s side door frame also appeared to lift off cleanly when investigators attempted to remove it, which should not occur with a manufacturer applied label. Manufacturer applied VIN stickers are designed to shred when attempted to be removed.

Ultimately, officers utilized an on-board diagnostics (OBD) reader to access the truck’s computer and identified the truck as [redacted]’s previously stolen Ford Shelby Raptor. Investigators confirmed the correct VIN for the vehicle by also inspecting the confidential VIN.

Officers also located a large number of keys and blank keys in the driver’s side door pocket. In the back of the truck, officers located a detached dashboard panel for a GMC or Chevrolet truck. Officers recovered a designer male shoulder bag that contained numerous titles and bills of sale for both OHVs and motor vehicles, and VIN stickers that appeared to be removed from glove boxes. There was also a Chihuahua, Mexico driver’s license with Garibo’s photo and date of birth, but the alias “Alejandro Munoz-Ortiz.” A device associated with Garibo contained a photo of this license dated June 10, 2023. In communications consistent with this time frame, Garibo referred to this as his “crooked name.” Officers researched the alias and discovered multiple OHVs registered to that name, including a suspected stolen OHV. Some of the bills of sale contained in the handbag listed the alias Alejandro Munoz-Ortiz. Officers recovered a second Sonora, Mexico driver’s license with Garibo’s photo and the name “Alexis Gustavo Garibo-Meraz.”

During an interview on September 20, 2023, Garibo stated he obtained [redacted]'s Ford Shelby Raptor from an unidentified seller through a trade set up by Villanueva. Garibo claimed he traded another Raptor truck he bought through Villanueva for Schulte's truck and still owed that seller \$10,000.

Devices and accounts associated with Garibo contained multiple photos of black Ford Raptor trucks during this time period. An iCloud photo dated August 17, 2023, showed a black Ford Raptor truck towing a trailer loaded with a detached truck cab parked near what investigators identified as [redacted] in Rifle, Colorado—an address associated with Garibo. A photo from the next day on Garibo's Facebook account showed a black Ford Raptor on a mechanic's lift. In an iCloud video dated September 1, 2023, a Ford Shelby Baja Raptor is shown driving next to the person filming, who then pans down to the interior of their own vehicle to show they are also driving a Shelby Raptor Baja (as indicated by the badging on the center console.) It is unclear if the video depicts [redacted]'s stolen vehicle. Officers also located Ford Shelby Raptor Baja decals during a search of Garibo's residence on October 11, 2023. (See Grand Jury Transcript, January 16, 2025, pages 162-172; March 6, 2025, pages 33-36.)

COUNT EIGHTEEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P **(Grand Jury Exhibit 2, Slides 39-41; Grand Jury Exhibit 2A, Slide 16)**

Between and including December 14, 2022 and March 19, 2024, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of [redacted], and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and/or attempted to alter or remove or altered or removed the vehicle identification number; in violation of section 18-4-409(3),(6)(b), C.R.S.

The offense alleged in Count 18 was committed in the following manner:

Between and including December 14, 2022 and December 15, 2022, [redacted]'s black 2019 Ford F-150 Raptor truck, VIN [redacted], Colorado state license plate [redacted], valued at \$77,542, was stolen [redacted] City and County of Denver, Colorado. Notably, the theft of [redacted]'s Ford Raptor was within a day of the theft of [redacted]'s Ford Raptor described immediately above.

In March 2024, detectives with the Glenwood Springs Police Department and the SPEAR task force were investigating a series of thefts of OHVs from [redacted] in [redacted]

Garfield County. Those investigators received information that Luis Alverto Rodriguez-Reyna (“Reyna”) was offering OHVs for sale without any paperwork for a significantly reduced price. Investigators determined that Reyna rented a storage building and area on a much larger property from [REDACTED] located at [REDACTED], Rifle, Garfield County, Colorado. After confirming through photographs provided by a lay witness that there was a suspected stolen OHV on Reyna’s portion of the property, officers obtained a search warrant to enter [REDACTED]’s property and inspect all the vehicles in the structure/area rented by Reyna. Investigators executed the same search warrant on March 19, 2024.

During the search of Reyna’s storage area on March 19, 2024, officers located and inspected a black Ford Raptor truck. At the time of the inspection, the truck displayed a public VIN sticker with the VIN [REDACTED]. Investigators researched the VIN ending [REDACTED] and located same on an auction website, consistent with the VIN cloning method described above with respect to [REDACTED]’s stolen vehicle. Investigators subsequently confirmed that the truck was [REDACTED]’s previously stolen Ford Raptor.

At the time of inspection, the vehicle’s after market rims and brake pads had seemingly been switched with that of other Ford Raptors, including [REDACTED]’s stolen truck. By March 2024, [REDACTED] had settled his claim with his insurer based on the theft of his vehicle, and Farmers Insurance was the registered owner of that truck at the time of recovery. Given the VIN discrepancies, [REDACTED]’s Ford Raptor was sent to an auto auction facility. When [REDACTED] initially viewed photos of [REDACTED]’s recovered Ford Raptor on that website, he believed he was viewing photos of his own vehicle because of the number of parts swapped between the two vehicles.

Within the truck recovered from Reyna’s storage area, officers also located paperwork belonging to Garibo. Investigators located photos on cell phones and/or devices associated with Garibo consistent with [REDACTED]’s stolen vehicle. Garibo’s device contained a photo of the fraudulent VIN sticker ending in VIN [REDACTED] dated May 8, 2023. [REDACTED]’s truck also had a distinctive after-market front bumper with two tow hooks on the front grill area. Following the traffic stop described above on September 8, 2023, Garibo sent messages to [REDACTED] also known as “[REDACTED]”, suggesting that the authorities might be looking for him from a photo. He also sent Lalo a photo of him standing in front of a black Ford Raptor truck consistent in appearance with [REDACTED]’s truck as indicated by the distinctive front bumper and tow hooks. Investigators reviewed a photo of a black Ford Raptor consistent with Bailey’s stolen vehicle on Garibo’s device dated May 23, 2023. Notably, the location of the photo appears to be Garibo’s known residence on [REDACTED] in Rifle, Colorado, and the truck pictured also has the same distinctive mountain badge/decals on the driver’s side door that [REDACTED]’s truck had. Investigators also located a fraudulent insurance card with the VIN ending [REDACTED] during a search of Garibo’s [REDACTED] residence. (See Grand Jury Transcript, January 16, 2025, pages 173-181; March 6, 2025, pages 36-38.)

COUNT NINETEEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 2, Slides 45-49; Grand Jury Exhibit 2A, Slides 17-18)

Between and including January 8, 2023 and September 13, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or remove or altered or removed the vehicle identification number, and/or and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT TWENTY

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 [F4] 24051
(Grand Jury Exhibit 2, Slides 45-49; Grand Jury Exhibit 2A, Slide 17-18)

On or about January 12, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully and feloniously attempted to influence _____, a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT TWENTY-ONE

FORGERY OF A GOVERNMENT ISSUED DOCUMENT, C.R.S. 18-5-102(1)(E) [F5] 1001E
(Grand Jury Exhibit 2, Slides 45-49; Grand Jury Exhibit 2A, Slide 17-18)

On or about January 12, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, with the intent to defraud _____, _____, and/or _____, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which was purported to be, or which was calculated to become or to represent if completed, a written instrument, namely: an Application for Colorado Certificate of Title for Motor Vehicle, officially issued or created by Colorado Department of Revenue, Division of Motor Vehicles and/or _____, a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

The offenses alleged in Counts 19 through 21 were committed in the following manner:

Between January 8, 2023 and January 9, 2023, [redacted]'s silver 2005 GMC Sierra dual rear-wheel truck, VIN [redacted], Colorado state license plate [redacted], valued at \$14,460, was stolen from [redacted] Johnstown, [redacted] Weld County, Colorado.

On or about September 13, 2023, Investigator [redacted] of the Colorado State Patrol drove by Alexis Gustavo Garibo-Meraz's known residence at [redacted] Colorado. [redacted] observed a silver dual rear-wheel truck parked in front of the home just to the south of the Garibo residence. [redacted] ran the license plate, Colorado state [redacted], on the vehicle which registered to [redacted] at [redacted] then inspected the public facing VIN [redacted], which corresponded to the CO [redacted] However, further investigation into the VIN revealed that the corresponding color code for the VIN ending [redacted] should be "Olympic White," not silver as was the parked vehicle. [redacted] also noted that the rivets on the public windshield VIN plate appeared damaged and not as a manufacturer would apply them.

[redacted] initially contacted [redacted], who confirmed she was [redacted]'s sister and that the truck parked on [redacted] was [redacted]'s. [redacted] coordinated a contact between [redacted] and [redacted], and assisted with translation for [redacted]. [redacted] confirmed that he purchased the vehicle from Garibo for \$10,000. [redacted] gave [redacted] permission to inspect the vehicle.

[redacted] inspected the vehicle the following day on September 14, 2023, after provided the vehicle's keys. The public VIN, the VIN sticker in the glove box and the NADER label all displayed VIN ending [redacted]; however, [redacted] verified the confidential VIN of the vehicle and confirmed that it was [redacted]'s previously stolen GMC Sierra. [redacted] reported that he was unaware that the vehicle had been stolen and described that he first saw Garibo with the vehicle around January 2023, consistent with the timing of the theft of [redacted]'s truck. [redacted] further stated that since that time, Garibo had been attempting to sell him the vehicle. [redacted] later recovered a photo from a device associated with Garibo dated February 13, 2023, that showed a silver truck consistent with [redacted] towing a flat trailer loaded with an OHV.

[redacted] investigated the source of the fraudulent VIN ending [redacted] that was publicly displayed on [redacted]'s stolen GMC Sierra at the time of recovery. [redacted] determined that VIN ending [redacted] legitimately belonged to a white 2002 GMC Sierra truck owned by [redacted] of [redacted] Otis, [redacted], Washington County, Colorado. Based on a Certificate of Title signed by [redacted] and Garibo, Garibo purchased [redacted]'s 2002 GMC Sierra VIN ending [redacted] on January

9, 2023. The purchase price listed on that document for the vehicle was \$3000, and Garibo listed his address as _____, Rifle, Colorado.

_____ determined that a local mechanic in Otis, Colorado named _____ facilitated the sale. _____ described that he had sold previously sold the GMC Sierra truck to _____, who in turn sold the truck to Garibo; however, _____ never signed the certificate of title as either a buyer (from _____) or seller (to Garibo). Auto theft investigators refer to this practice as a “skipped title.” Upon contact, _____ recalled selling _____’s truck to a “Hispanic man from Denver,” and reported that all that was transferred at the time of the sale was the truck cab with all the VINs intact.

On or about January 12, 2023, Garibo applied for a title for a 2002 GMC diesel truck, VIN ending _____. Garibo completed the Application for Colorado Certificate of Title for Motor Vehicle with Colorado Department of Revenue, Division of Motor Vehicles (“DMV”) Agent _____ at that agency’s office in Rifle, Garfield County, Colorado. Garibo listed a purchase date of January 9, 2023, (consistent with the time frame of the theft of _____’s vehicle), and a purchase price of \$1000. Garibo listed his address as _____, Apartment _____, Parachute, Colorado, _____. The title application was accepted on January 12, 2023.

During an interview on September 20, 2023, Garibo stated that he received the truck from Villanueva. _____ reviewed title documents for the subsequent transfer/sale of the vehicle between Garibo and _____ wherein Garibo represented that he sold the truck for \$800. _____ had successfully titled _____’s truck to himself at the time of recovery. (See Grand Jury Transcript, January 16, 2025, pages 186-199; March 6, 2025, pages 38-41.)

COUNT TWENTY-TWO

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P **(Grand Jury Exhibit 2, Slides 50-51; Grand Jury Exhibit 2A, Slide 19)**

Between and including February 13, 2023 and September 21, 2023, in the State of Colorado, **Jose Armando Luzania-Martinez**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____ and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or remove or altered or removed the vehicle identification number; in violation of section 18-4-409(3),(6)(b), C.R.S.

The offense alleged in Count 22 was committed in the following manner:

Between February 13, 2023 and February 14, 2023, [redacted]'s silver 2008 Chevrolet Silverado 2500 truck, VIN [redacted], Texas state license plate [redacted], valued at \$23,887, was stolen from [redacted] King Fisher County, Oklahoma. [redacted] resides in Texas, but her vehicle was stolen while she was visiting Oklahoma.

On or about September 8, 2023, Investigator [redacted] of the Colorado State Patrol drove through the parking lot of Jose Armando Luzania-Martinez's and Luis Enrique Villanueva-Gonzalez's known residence at [redacted] Rifle, Garfield County, Colorado. As described throughout, in addition to being the known residence of Villanueva and Luzania, Garibo used this residence for the purpose of titling multiple vehicles. Investigators observed a Chevrolet Silverado with a Chihuahua license plate that had no return registration information. In addition, investigators observed the public windshield VIN plate [redacted], and noted that the VIN also did not provide or return any information as would be expected.

[redacted] conducted additional research on the VIN ending [redacted] and located a vehicle with that VIN on an auction website. Specifically, the auction website listed a black pickup truck with VIN ending [redacted] for salvage sale with significant front and side damage. Investigators subsequently seized and impounded the vehicle from the apartment parking lot and obtained a search warrant for the same. That search warrant was executed on September 21, 2023.

Upon inspection on September 21, 2023, [redacted] observed the NADER label sticker on the door frame was peeling cleaning away and not as if a manufacturer had applied it, and it appeared fraudulent. The VIN intake label under the hood had been scratched and gouged, and was not as a manufacturer would install that label. The VIN plate also appeared to have been glued down, as opposed to being attached with rivets. [redacted] confirmed the vehicle inspected was [redacted]'s previously stolen Chevrolet Silverado.

From the interior of the vehicle, investigators located numerous documents including a suspected fraudulent Tennessee salvage/junk title for a 2010 black Silverado for VIN ending [redacted]. Investigators also found a pay stub for Luzania from White River Construction dated July 5, 2023, for \$1,312.50. Investigators identified a Rent-A-Center receipt dated July 17, 2023, for [redacted] for [redacted], Parachute, Colorado. Investigators subsequently identified [redacted] as Luzania's wife. Investigators recovered two money order receipts: one dated September 4, 2023, showing Luzania sending \$110 to Agua

Prieta, Sonora, Mexico, and another dated August 28, 2023, showing sending money to the same recipient.

During an interview on September 20, 2023, Garibo stated that the vehicle belonged to Luzania. (See Grand Jury Transcript, January 16, 2025, pages 199-205; March 6, 2025, pages 41-42.)

COUNT TWENTY-THREE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P **(Grand Jury Exhibit 2, Slides 52-55; Grand Jury Exhibit 2A, Slides 20-21)**

Between and including April 28, 2023 and October 3, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Jose Armando Luzania-Martinez**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and/or attempted to alter or remove or altered or removed the vehicle identification number; in violation of section 18-4-409(3),(6)(b), C.R.S.

The offense alleged in Count 23 was committed in the following manner:

On April 28, 2023, _____'s black 2002 Chevrolet Silverado 2500 truck, VIN _____, Colorado state license plate _____, valued at \$14,336, was stolen from her residence at _____, Grand Junction, _____, Mesa County, Colorado.

During the September 8, 2023 traffic stop wherein law enforcement recovered Conly _____'s Ford Raptor, described above, officers recovered a handbag from Alexis Gustavo Garibo-Meraz as the driver of the vehicle. Within the handbag, investigators located numerous detached glove box VIN stickers including a sticker displaying a VIN ending _____. Investigator _____ of the Colorado State Patrol researched the vehicles associated with those stickers and VINs, and located a vehicle with VIN ending _____ registered to _____.

On October 3, 2023, officers contacted _____ in his vehicle for a traffic stop at Interstate 70, mile marker 94, Garfield County, Colorado. The vehicle _____ was driving was a Chevrolet Silverado pickup truck, with a black four door cab and a silver truck bed. _____ was the sole occupant of the vehicle at that time. _____ reported that he purchased the truck from "Armando" for \$8000 at Aardvark Storage, _____, Rifle, Colorado. _____ further explained that Armando lived in _____ and provided a phone number for Armando's wife _____. That phone number matched the phone number on the

money orders recovered from the truck described above. These identifying details are consistent with Luzania.

At the time of the traffic stop, 's vehicle publicly displayed VIN . With 's permission, investigators inspected his vehicle and confirming the vehicle was actually 's previously stolen Chevrolet Silverado. At the time of recovery, door line trim and the vehicle's rims had been removed, and the entire truck bed had been replaced.

Investigator conducted additional investigation into the source of the VIN ending . located Facebook messenger communications between Luzania and a Facebook seller . The content of those messages dated August 30, 2023, showed that Luzania contacted to purchase a white Chevrolet Silverado extended cab truck with Colorado license plate that had posted for sale on Facebook. Importantly, CO registered to VIN ending . In reviewing the messages, noted that Luzania initially asked to buy only the truck cab and title. Ultimately, the two appeared to have agreed on purchase price of \$600, and Luzania could have the title and VIN "papers" for a different extended cab truck that no longer had in his possession. In communications dated September 2, 2023, provided Luzania with his phone number and address in Delta, Colorado, suggesting that they may have met to complete the sale.

further researched the VIN ending and noted that the original owner of that vehicle appeared to be . reviewed a bill of sale dated August 10, 2023, that listed as the seller and as the buyer of a vehicle with VIN ending attempted to contact , but was unsuccessful. Neither nor Luzania are listed in the bill of sale, suggestive of a "skipped" or "open" title, similar to that described above regarding s truck. later obtained a title for a truck with the VIN ending (See Grand Jury Transcript, January 16, 2025, pages 205-214; March 6, 2025, pages 43-46.)

COUNT TWENTY-FOUR

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A1G

(Grand Jury Exhibit 3, Slides 2-4)

Between and including April 28, 2023 and March 19, 2024, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Luis Alverto Rodriguez-Reyna**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a blue 2023 Polaris RZR OHV of Karl Malone Motorsports, with the value of twenty thousand dollars or more but less than one

hundred thousand dollars, and intended to deprive Karl Malone Motorsports permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

COUNT TWENTY-FIVE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibit 3, Slides 5-6)

Between and including June 21, 2023 and March 19, 2024, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Luis Alverto Rodriguez-Reyna**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and/or attempted to alter or remove or altered or removed the vehicle identification number, and/or unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT TWENTY-SIX

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A1G

(Grand Jury Exhibit 3, Slides 7-10)

Between and including July 31, 2023 and August 1, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, **Luis Enrique Villanueva-Gonzalez**, and **Luis Alverto Rodriguez-Reyna**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a red and black 2022 CAN-AM Maverick X3 Turbo OHV of _____ with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive _____ permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offenses alleged in Counts 24-26 were committed in the following manner:

On April 28, 2023, a blue 2023 Polaris RZR OHV, VIN _____, valued at \$39,584, was stolen from Karl Malone Motorsports, _____, Glenwood Springs, Colorado _____. Between June 21, 2023, and June 22, 2023, a white 2007 Chevrolet Silverado 3500, VIN _____, Colorado state license plate _____ valued at \$41,551, was stolen from _____ Colorado _____. Between July 31, 2023, and August 1, 2023, a red and black 2022 CAN-AM Maverick X3 Turbo OHV,

VIN: _____, Utah license plate _____, valued at \$29,799, was stolen from _____ at _____ Cedar Hills, Utah

These vehicles were all recovered between March 19, 2024, and March 20, 2024, as a result of a search warrant executed at the shop of Rodriguez-Reyna Rifle, Colorado, _____ and follow-up investigation. Upon recovery of the vehicles, the Karl Malone Polaris OHV was displaying a fraudulent VIN _____. The stolen Chevrolet Silverado belonging to _____ was displaying fraudulent VIN _____, and the stolen CAN-AM Maverick of _____ was displaying the fraudulent VIN _____

Beginning on February 7, 2024, Luis Alverto Rodriguez-Reyna offered to sell _____ what turned out to be the above-mentioned stolen Polaris RZR OHV of Karl Malone Motorsports for \$22,000. Rodriguez-Reyna informed _____ that he did not have a title to the vehicle but could create registration for the sale. Rodriguez-Reyna also offered to sell _____ a white Chevrolet Silverado 3500 truck with no paperwork. Suspecting the vehicles were stolen, _____ reported this behavior to law enforcement who ultimately contacted Rodriguez-Reyna.

Based on _____'s report, as well as other information, investigators identified a shop located at _____ Rifle, Colorado, as a location that Rodriguez-Reyna rented from the property owner _____. On March 19, 2024, law enforcement obtained and executed a search warrant at _____ Rifle, Colorado, and located, among other stolen vehicles, the Karl Malone Polaris RZR that Rodriguez-Reyna was attempting to sell to _____. Investigators confirmed that the true RZR VIN ending in _____ had been replaced with the VIN _____ which belonged to a 2022 Polaris RZR Pro R4 that had been listed for sale on an auction website. A photo from Garibo's phone dated April 29, 2023, the day after the theft, showed two men apparently using a power tool to remove the VIN on the stolen Karl Malone Polaris RZR.

Also during the March 19, 2024, search warrant executed at Rodriguez-Reyna's shop, law enforcement recovered the stolen _____ 2007 Chevrolet Silverado 3500 with the true VIN ending in _____. Investigators learned that the true VIN was replaced with a fraudulent VIN _____ and the vehicle was bearing a false Colorado temporary registration tag of _____. Upon further investigation, officers learned that the false plate number was cloned from a DMV-registered vehicle owned by _____ of _____ Parker, Colorado.

Investigators utilized an on-board diagnostic (OBD) tool on the recovered Silverado 3500 and identified that the true VIN was the number ending in _____. After the vehicle was recovered

by law enforcement, the owner, _____ identified that several post market additions he placed on the vehicle were removed. Photos of the stolen Silverado 3500 were located on Garibo's phone that was seized by law enforcement. Investigators interviewed Rodriguez-Reyna who acknowledged possessing the vehicle for a period of time. Rodriguez-Reyna further stated that he knew that the vehicles seized by law enforcement and the others pictured to be on his property were likely stolen and that Garibo had warned him not to say anything "stupid" to the police.

On March 20, 2023, the day after law enforcement executed a search warrant at Rodriguez-Reyna's shop, Rodriguez-Reyna agreed to bring to the sheriff's office what turned out to be the stolen CAN-AM Maverick belonging to _____. Upon inspection of the OHV, investigators saw that the VIN number displayed on the CAN-AM did not match the manufacturer's VIN still on the frame behind the tire. Further investigation into the VIN displayed on the _____ CAN-AM Maverick ending _____ revealed that it belonged to an OHV that was listed and sold on an auction website for \$16,000.

Investigators spoke with _____ who owned the property and rented it to Rodriguez-Reyna. _____ informed officers that he had seen Garibo, Villanueva, and others at the property and that he saw a large number of OHVs and trucks in the garage where the stolen vehicles were recovered during the search warrant. _____ also stated that he observed an exchange between Garibo and Rodriguez-Reyna for \$30,000 for the stolen _____ Raptor described in the charges above.

Investigators ultimately seized a phone attributed to Villanueva and recovered photographs and a video, dated August 15 and 16, 2023, respectively, of _____'s stolen CAN-AM Maverick. In an August 16, 2023, video, the CAN-AM can be seen and heard running and the camera pans around the vehicle which is in a garage storage unit. Investigators identified that unit as consistent with the Aardvark storage unit rented by Villanueva. (See Grand Jury Transcript, March 6, 2025, pages 47-62.)

COUNT TWENTY-SEVEN

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A1G

(Grand Jury Exhibit 3, Slides 11-18)

Between and including July 31, 2023 and August 30, 2023, in the State of Colorado, **Jose Armando Luzania-Martinez**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a gray, black and red 2022 Polaris RZR Turbo OHV of Karl Malone Motorsports, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and

intended to deprive Karl Malone Motorsports permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offense alleged in Count 27 was committed in the following manner:

On April 28, 2023, a gray, black, and red 2022 Polaris RZR Turbo OHV, VIN [REDACTED], valued at \$35,299, was stolen from Karl Malone Motorsports, at [REDACTED], Glenwood Springs, Colorado [REDACTED]. Notably, this theft occurred on the same day at the same location as the blue 2023 Polaris RZR owned by Karl Malone Motorsports and recovered at the shop of Rodriguez-Reyna on March 19, 2023, described above. This 2022 Polaris RZR Turbo was recovered on August 30, 2023, at a storage unit utilized by Luzania.

On August 30, 2023, an employee of Karl Malone Motorsports went to Parachute Mini Storage, at [REDACTED], Parachute, Colorado, to visit an unrelated storage unit. While at Parachute Mini Storage, the employee noticed the stolen Polaris RZR Turbo OHV and reported it to police. That same day, law enforcement inspected the vehicle at the storage facility and found that the original VIN sticker had been removed and the VIN on the frame of the vehicle had been ground off. A fraudulent VIN sticker displaying VIN [REDACTED] had been attached which was found to be sourced from a listed vehicle on a BidCars auction website. Investigators attached an OBD reader to the vehicle which showed a true VIN of [REDACTED]. This true VIN matched the gray, black, and red 2022 Polaris RZR OHV stolen from Karl Malone Motorsports on April 28, 2023.

Investigators learned that [REDACTED] was listed as the renter of the Parachute Mini Storage unit where the stolen Polaris RZR Turbo with VIN ending in [REDACTED] was recovered. [REDACTED] was also listed as the renter of [REDACTED], Apartment [REDACTED], Parachute, Colorado. [REDACTED] gave an interview to law enforcement and reported that she sublet both the Parachute Mini Storage unit and the apartment on [REDACTED] to Jose Armando Luzania-Martinez and his wife.

A follow-up investigation revealed that Luzania had registered the cloned VIN ending in [REDACTED] with Colorado Parks and Wildlife as his own vehicle. Colorado Parks and Wildlife had a record from that registration event of a "bill of sale" that was hand-written with no discernable printed name, and indicating the vehicle with the VIN ending in [REDACTED] was sold for \$35,000 in cash on August 1, 2023. Photos and videos of the Polaris RZR were found on Luzania's Facebook page showing what appears to be Luzania driving the vehicle. This video was taken within five days of Luzania registering the vehicle with Parks and Wildlife.

Photos and videos of the stolen Polaris RZR Turbo were found on Garibo's phone. A video from Garibo's phone dated July 30, 2023, showed the stolen Polaris RZR Turbo attached to a stolen 2019 black Ford Raptor that was later recovered by law enforcement.

(See Grand Jury Transcript, March 6, 2025, pages 67-82.)

COUNT TWENTY-EIGHT

AGGRAVATED MOTOR VEHICLE THEFT IN THE FIRST DEGREE - LESS THAN \$20,000, C.R.S. 18-4-409(2),(3)(A) [F5] 080AG
(Grand Jury Exhibit 3, Slides 19-25)

Between and including May 4, 2023 and October 12, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Jose Armando Luzania-Martinez**, unlawfully, feloniously, and knowingly obtained or exercised control over the motor vehicle of iDrive Utah Truck, without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or disguise or altered or disguised the appearance of the motor vehicle, and/or attempted to alter or remove or altered or removed the vehicle identification number, and the value of the motor vehicle was less than twenty thousand dollars; in violation of section 18-4-409(2),(3)(a), C.R.S.

COUNT TWENTY-NINE

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 [F4] 24051
(Grand Jury Exhibit 3, Slides 19-25)

On or about May 5, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully and feloniously attempted to influence _____, a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT THIRTY

FORGERY OF A GOVERNMENT ISSUED DOCUMENT, C.R.S. 18-5-102(1)(E) [F5] 1001E
(Grand Jury Exhibit 3, Slides 19-25)

On or about May 5, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, with the intent to defraud iDrive Utah Trucks, _____, and/or _____, unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which was purported to be, or which was calculated to become or to represent if completed, a written instrument, namely: an Application for Colorado Certificate of Title for Motor Vehicle, officially issued or created by Colorado Department of Revenue, Division of

Motor Vehicles and/or _____, a public office, public servant, or government agency; in violation of section 18-5-102(1) (e), C.R.S.

The offenses alleged in Counts 28 through 30 were committed in the following manner:

On May 4, 2023, a gray 2007 Chevrolet Silverado 1500, VIN _____, valued at \$13,896, was stolen from iDrive Utah Trucks at _____, Orem, Utah. That vehicle was later brought to the State of Colorado and fraudulently registered with a swapped VIN ending in _____ by Alexis Gustavo Garibo-Meraz. On May 5, 2025, Garibo applied for and received a title for the VIN ending in _____ with DMV agent _____ at 195 14th Street, Building D Suite 100, Rifle, Colorado 81650. The source of the fraudulently swapped VIN was the cab of another truck that Garibo purchased from a seller in Grand Junction, Colorado, sometime around February 2023. Garibo then sold the Chevrolet Silverado, at that time bearing the fraudulently swapped VIN ending in _____ and associated title to _____ of Rifle, Colorado. Law enforcement contacted _____ who informed that the vehicle was in Utah, but agreed to bring it to the sheriff's office in Garfield County, Colorado. Upon inspection, investigators identified the Silverado 1500 with the true VIN as ending in _____ as the stolen truck belonging to iDrive Utah Trucks and took possession. (See Grand Jury Transcript, March 6, 2025, pages 82-96.)

COUNT THIRTY-ONE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P **(Grand Jury Exhibit 3, Slides 26-28)**

On or about May 4, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

The offense alleged in Count 31 was committed in the following manner:

Between May 4, 2023 and May 5, 2023, a white 2006 Chevrolet Silverado 2500, VIN _____, Utah license plate _____, valued at \$25,516, was stolen from _____ at _____, Provo, Utah. This theft occurred the same day and within an hour and 20-minute drive from where the iDrive truck with VIN ending in _____ described above was stolen.

On March 21, 2024, law enforcement contacted _____ driving a truck with license plates registered to a GMC truck. The doors of _____ s Chevrolet Silverado truck were

identified and recovered from the GMC truck _____ was driving when contacted. Though the VIN sticker had been removed, the original VIN number ending in _____ associated with _____'s truck was still visible on the door of the truck _____ was driving.

Investigation revealed that Garibo had sent a picture of the stolen truck on May 18, 2023, to an individual named _____ and indicated that he got the truck from Salt Lake City. Garibo had further conversations with _____ in what appeared to be an attempt to sell him the vehicle.

_____ was shown the photos from Garibo's phone and identified his stolen truck based on a new igloo doghouse he had recently purchased that was visible in the back of the truck as well as other after-market additions he had made to the truck. (See Grand Jury Transcript, March 6, 2025, pages 96-102.)

COUNT THIRTY-TWO

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(H) [F5] 08A1F

(Grand Jury Exhibit 3, Slides 29-34)

Between and including May 5, 2023 and April 4, 2024, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a gray, gold, and red 2019 Can-Am Maverick X3 OHV of _____ with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive _____ permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offense alleged in Count 32 was committed in the following manner:

On May 5, 2023, a gray, gold, and red 2019 CAN-AM Maverick X3, VIN _____, Utah license plate _____, valued at \$19,999, was stolen from _____ at _____ Pleasant Grove, Utah,

On April 1, 2024, Garibo's roommate, _____, sent investigators a WhatsApp post from Garibo showing the stolen CAN-AM Maverick X3 in a storage area near the Garfield County Sheriff's office. Investigators obtained and executed a search warrant at _____, Rifle, Colorado and located the stolen CAN-AM bearing a fraudulent VIN of _____, and a Mexico custom license plate "_____" Investigators located the true VIN on the vehicle ending in _____. Further investigation revealed that the false VIN was registered under a known alias of Garibo's, "Alejandro Munoz Ortiz." This alias was found on an identification card owned by Garibo that was seized by law enforcement. Investigators later

found photographs of the stolen CAN-AM on Garibo's phone. Photos of 7-Eleven receipts found on Garibo's phone showed purchases made in Salt Lake City, Utah days before the thefts of the iDrive and trucks described in charges above, and the CAN-AM theft described here. A video of the CAN-AM was also located on Garibo's phone.

During the execution of the warrant at in Rifle, was present and informed law enforcement that he owned the CAN-AM and that he obtained the vehicle from Garibo in exchange for another vehicle.

Facebook messages from between May 18, 2023, and July 13, 2023, that were obtained by law enforcement, showed that and Garibo discussed the CAN-AM registration. asked if the vehicle had papers. Garibo provided his alias name, "Alejandro Munoz Ortiz," to . Ultimately, per the messages, Garibo secured the fictitious registration using the VIN ending in for the vehicle with Colorado Parks and Wildlife and provided the registration stickers to . (See Grand Jury Transcript, March 6, 2025, pages 102-111.)

COUNT THIRTY-THREE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P **(Grand Jury Exhibit 3, Slides 35-48)**

On or about May 21, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of and , and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT THIRTY-FOUR

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A1G

(Grand Jury Exhibit 3, Slides 35-48)

On or about May 23, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Jose Armando Luzania-Martinez**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a black 2023 workhorse flatbed trailer and a gray and orange Polaris RZR OHV of _____ and _____, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive _____ and _____ permanently of their use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

COUNT THIRTY-FIVE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibit 3, Slides 35-48)

On or about May 21, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Luis Enrique Villanueva-Gonzalez**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT THIRTY-SIX

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A1G

(Grand Jury Exhibit 3, Slides 35-48)

On or about May 23, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Luis Enrique Villanueva-Gonzalez**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2020 Chrome Aluma 7814STIL flatbed trailer and a black 2019 Can-Am Maverick OHV of _____, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive _____ permanently of their use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offenses alleged in Counts 33 through 36 were committed in the following manner:

On May 23, 2023, a purple 2001 Dodge Ram 2500, VIN _____, Utah license plate _____, valued at \$10,000, a gray and orange 2018 Polaris RZR, VIN _____, Utah license plate _____, valued at \$20,000, and a black 2023 Workhorse Flatbed Trailer, VIN _____, Utah license plate _____, valued at \$6,000 were stolen from _____ and _____ at _____, Bluffdale, Utah _____. To date, these vehicles remain unrecovered.

Video surveillance from the home of _____ and _____ dated May 23, 2023, captured a vehicle consistent the Ford F-250 truck known to be owned by Garibo at the time of the theft. According to _____, the truck depicted on the video made a pass of his house and returned a short while later. Two men got out of the truck, hopped _____'s fence and took his truck, using it to tow his trailer and RZR OHV.

Garibo's Ford truck was captured on a license plate reader traveling toward Utah two days before the theft of _____'s truck and returning to Colorado on the morning of the theft. On the return trip, the mud flaps and hitch ball of Garibo's truck were removed and placed in the bed of the truck. Garibo's iCloud contained images from May 22, 2023, the evening prior to the theft, of himself and Villanueva at a hotel, consistent with a trip to Utah to complete the thefts.

Video recovered from Garibo's iCloud account showed an RZR consistent with that of the _____'s vehicle from the date of the theft. _____ was shown the video and still images from Garibo's account and identified known stickers, damage to the roof, and other unique features of his stolen RZR. A man who appeared to be Luzania was observed in the video on Garibo's phone.

On May 23, 2023, the same night and in close proximity to the _____ thefts, a tan 2005 Chevrolet Silverado 3500, VIN _____ Utah license plate _____, valued at \$15,987, was stolen from _____ at _____, South Jordan, Utah _____. Also on that day, a chrome 2020 Aluma 7814STIL flatbed trailer, VIN _____, valued at \$3,000 and a black 2019 CAN-AM Maverick, VIN _____, Utah license plate _____ were stolen from _____ at _____, Saratoga Springs, Utah _____. These vehicles also remain unrecovered to date.

Law enforcement recovered surveillance video from _____'s house from the time of the theft of her Chevrolet Silverado 3500. The video showed what appeared to be the same Ford F-250 truck from the _____'s theft enter frame. This appeared to be Garibo's Ford F-250

based on the lights and other distinctive features. A short time later, three males are shown stealing [redacted]'s Chevrolet Silverado 3500.

Further investigation revealed that the [redacted] and [redacted] homes are 5.9 miles apart, or 11 minutes travel by car. According to the surveillance videos at each home, the two thefts occurred approximately 21 minutes apart.

Additional surveillance, dated May 23, 2023, recovered from another part of the community where the [redacted]'s home was located showed the tan 2005 Chevrolet Silverado 3500 belonging to [redacted] enter the neighborhood where the [redacted]'s home is located without anything hooked up to the truck. Approximately nine minutes later [redacted]'s stolen Silverado was attached to [redacted]'s stolen trailer and OHV and exiting the same neighborhood.

Later in the morning of May 23, 2023, license plate readers captured [redacted]'s truck as it departed Utah and entered Colorado, prior to it being reported stolen. The LPR images showed that [redacted]'s truck was towing both the flatbed trailer and Black CAN-AM Maverick stolen from [redacted]'s home. The suspected Ford F-250 truck of Garibo was captured by LPR entering Colorado within an hour of the stolen vehicles.

Images later recovered from Garibo's phone, dated May 26, 2023, show what appears to be Villanueva standing near [redacted]'s stolen CAN-AM OHV in a storage lot. Additional photos appear to depict [redacted]'s OHV being towed by another known stolen vehicle, [redacted]'s Ford Velociraptor Hennessey, which is described in charges above. An additional photo showed [redacted]'s OHV parked next to a trailer displaying a license plate that was registered to Garibo. [redacted] was shown pictures of the OHV from Grabio's phone and identified it as his stolen CAN-AM Maverick based on distinctive features. (See Grand Jury Transcript, March 6, 2025, pages 111-132.)

COUNT THIRTY-SEVEN

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 3, Slides 51-54)

Between and including September 5, 2023 and August 8, 2024, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Jose Maria Madrid-Trevizo**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of

, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or remove or altered or removed the vehicle identification number, and/or and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT THIRTY-EIGHT

ATTEMPT TO INFLUENCE A PUBLIC SERVANT, C.R.S. 18-8-306 [F4] 24051
(Grand Jury Exhibit 3, Slides 51-54)

On or about November 2, 2023, in the State of Colorado, **Jose Maria Madrid-Trevizo**, unlawfully and feloniously attempted to influence a public servant, by means of deceit, with the intent thereby to alter or affect the public servant's decision, vote, opinion, or action concerning a matter which was to be considered or performed by the public servant or the agency or body of which the public servant was a member; in violation of section 18-8-306, C.R.S.

COUNT THIRTY-NINE

FORGERY OF A GOVERNMENT ISSUED DOCUMENT, C.R.S. 18-5-102(1)(E) [F5] 1001E
(Grand Jury Exhibit 3, Slides 51-54)

On or about November 2, 2023, in the State of Colorado, **Jose Maria Madrid-Trevizo**, with the intent to defraud , and/or , unlawfully, feloniously, and falsely made, completed, altered, or uttered a written instrument which was or which was purported to be, or which was calculated to become or to represent if completed, a written instrument, namely: an Application for Colorado Certificate of Title for Motor Vehicle, officially issued or created by Colorado Department of Revenue, Division of Motor Vehicles and/or a public office, public servant, or government agency; in violation of section 18-5-102(1)(e), C.R.S.

COUNT FORTY

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A1G

(Grand Jury Exhibit 3, Slides 55-56)

Between and including July 10, 2023 and August 8, 2024, in the State of Colorado, **Jose Maria Madrid-Trevizo**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely a 2022 silver Charmac Stealth trailer of Prime Motorsports MT, LLC, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Prime Motorsports MT LLC permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offenses alleged in Counts 37 through 40 were committed in the following manner:

On September 5, 2023, a white 2001 Dodge Ram 2500, VIN _____, Utah license plate _____, valued at \$20,000, was stolen from _____ at _____, Pleasant Grove, Utah _____. Between July 10, 2023, and July 14, 2023, a 2022 silver Charmac Stealth trailer, belonging to Prime Motorsports MT LLC, _____, was stolen from a storage facility located in Orem, Utah. Both the Dodge Ram 2500 and Charmac Stealth trailer were recovered by law enforcement on August 8, 2024, at the home of Jose Madrid at _____ Parachute, Garfield County, Colorado. The stolen Ram 2500 was found to be bearing a fraudulent VIN of _____, and Colorado license plate _____, while the trailer had the VIN _____ removed.

Investigators found Facebook messenger conversations and photos between Garibo and Madrid regarding a VIN etching machine. Investigators began looking into Madrid based on these conversations and a Garfield County Task Force Officer drove past Madrid's house at _____ Parachute, Colorado, and located what appeared to be _____ s stolen Dodge Ram 2500. The law enforcement officer took photos of the suspected stolen truck which _____ identified as his truck based on distinct after-market features.

A records search of the license plate on the Ram truck located at Madrid's house revealed that Madrid titled a 2001 Dodge Ram 2500 with VIN ending _____ on November 2, 2023, listing a purchase date of October 20, 2023, and a purchase price of \$200. This registration application was made to Colorado DMV agent _____ at 51027 HWY 6, Glenwood Springs, CO, 81650, Garfield County.

Law enforcement obtained and executed a search warrant at Madrid's house and confirmed that the true VIN ending in [REDACTED] had been replaced by the fraudulent VIN ending in [REDACTED]. During the search at Madrid's home, officers located and seized an Xtool pneumatic Dot Peen Marking Machine suspected to be used by Madrid and the enterprise members for VIN etching. Photos obtained from Garibo's iCloud account show a man using that machine in a garage near the back of an OHV where investigators know the VIN would be located. Further photos from Garibo's iCloud, located in the same series as the etching machine, show images of a computer program displaying VIN numbers and etched VIN numbers on what appear to an OHV.

Further inspection of [REDACTED]'s truck revealed that the dashboard had been replaced. Furthermore, the public VIN label was peeling off from one side and the VIN plate was improperly positioned. The fraudulent VIN ending in [REDACTED] was found to belong to a dark garnet and red pearl colored truck that Madrid purchased from [REDACTED] in Rifle Colorado for \$200 at a reported mileage of 178,908.

During the search of Madrid's property in Parachute, investigators located the stolen 2022 Silver Charmac Stealth trailer belonging to Prime Motorsports MT LLC. Investigators observed that the original VIN sticker had been removed, and in its place was the tamper evident void indicator. The true VIN of the trailer was identified and confirmed that the trailer was that of Prime Motorsports MT LLC with the true VIN ending in [REDACTED].

Madrid was contacted by law enforcement and stated that he had purchased the truck and trailer from a man in Denver, Colorado. Madrid was unable to provide any paperwork for the Charmac Stealth trailer. Inside a drawer at Madrid's house, officers located a debit card belonging to Alexis Garibo as well as identifying information for Madrid. (*See Grand Jury Transcript, March 6, 2025, pages 136-147.*)

COUNT FORTY-ONE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 3, Slides 57-60)

Between and including September 6, 2023 and September 7, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Luis Enrique Villanueva-Gonzalez**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and attempted to alter or remove or altered or removed the vehicle identification number, and/or and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FORTY-TWO

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 3, Slides 61-63)

Between and including September 6, 2023 and September 13, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, **Luis Enrique Villanueva-Gonzalez**, and **Jose Armando Luzania-Martinez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or remove or altered or removed the vehicle identification number; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FORTY-THREE

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(H) [F5] 08A1F
(Grand Jury Exhibit 3, Slides 64-66)

Between and including September 6, 2023 and September 13, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, **Luis Enrique Villanueva-Gonzalez**, and **Jose Armando Luzania-Martinez** unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2021 black PJ Trailer 3H412 of _____ with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive James Patterson/Patterson Homes permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offenses alleged in Counts 41 through 43 were committed in the following manner:

On September 6, 2023, a 2007 maroon GMC Sierra, VIN _____, Utah license plate _____, valued at \$23,877 belonging to _____ was stolen from his home at _____, Utah _____. This vehicle was recovered the next day being driven by Luis Enrique Villanueva-Gonzalez bearing a fraudulent VIN _____ and Colorado license plate _____.

Also on September 6, 2023, a 2005 white Dodge Ram 2500, VIN _____, Utah license plate _____, valued at \$18,212 was stolen from _____ at his home at _____, Pleasant Grove, Utah _____. That same day, a 2021, Black PJ trailer 3H412, _____ valued at \$10,000, belonging to _____, Highland, Utah, was stolen from _____, American Fork, Utah _____. _____'s truck and _____ trailer were recovered on September 13, 2023, at Mod Storage located at _____, Rifle, Colorado. The truck was found on the trailer. At the time of the recovery, the _____ truck was displaying a fraudulent VIN _____ and the _____ trailer had its VIN label removed.

On September 7, 2023, Villanueva was stopped by law enforcement driving what was found to be _____'s stolen GMC Sierra. Passengers of the stolen GMC Sierra included Jose Luzania, _____. The stolen vehicle was identified and stopped because law enforcement applied for and obtained a GPS location warrant associated with a phone that appeared to be traveling with the stolen vehicle. This phone, found to be in the possession of Villanueva during the stop and subscribed to Alexis Garibo, was tied to several of the thefts as described throughout this indictment.

Upon inspection of the GMC Sierra, law enforcement found that the Colorado license plate, _____, displayed on the vehicle was registered to "Alexis Garib" at _____ Apartment _____, Parachute, Colorado. This license plate was registered to a different 2003 maroon GMC titled to Garibo with a VIN ending in _____. It was later discovered that Garibo had a video on his phone dated September 9, 2023, depicting a man holding the VIN plate ending in _____. Investigators saw that the stolen GMC Sierra they had stopped had a public VIN ending in _____ and the Nader label inside the driver's door had been removed. Officers, however, could faintly see the imprint of the true VIN and identified the truck as _____'s stolen GMC Sierra.

During the stop, Villanueva presented an insurance card to the officers with the alias "Alejandro Quintana-Vazquez" for a vehicle with the VIN ending in _____. During a search of the vehicle, officers located registration paperwork and the insurance card of _____.

Facebook content from Garibo dated May 16, 2023, revealed that the source of the swapped VIN ending in [REDACTED] was from an individual identified as “[REDACTED]” who agreed to sell Garibo the “title and tags” of the cab of a 2005 GMC Sierra for \$500. Photos of the title for VIN ending in [REDACTED], as well as a prior bill of sale from when [REDACTED] purchased the vehicle, were found on Garibo’s Facebook account, having been sent by [REDACTED] Garibo and [REDACTED]. [REDACTED] arranged for Garibo to travel to Albuquerque, New Mexico to retrieve the title. Photos on [REDACTED] from Garibo’s Facebook account showed Villanueva and another man dated May 17, 2023, traveling in a vehicle. These photos appeared consistent with Villanueva and Garibo traveling to Albuquerque to complete the purchase of [REDACTED]’s title and VIN materials.

On September 13, 2023, Garibo’s roommate [REDACTED] informed investigators of a storage facility he knew Garibo to use located near the airport. Investigators identified Mod Storage, [REDACTED] Rifle, Colorado, based on a business card for that facility found in his possession during the investigation. Investigators were granted permission by the owner of Mod Storage to drive a loop of the facility where they identified [REDACTED]’s truck positioned on the [REDACTED] trailer parked in spot #1007. Later in the investigation, Villanueva was found to have an image of a card listing Mod Storage space #1007 in one of his phones.

When investigators inspected [REDACTED]’s truck, the original Utah license plate registered to [REDACTED] was found in the bed of the truck. The distinctive mud flaps from the truck had been removed and placed under the truck. The Nader label on the driver’s door was removed and the ignition was changed such that the original key no longer worked to start the engine. The truck now was displaying a fraudulent VIN ending in [REDACTED]. The true VIN ending in 27202 was identified by a VIN sticker located on the truck frame. Portions of the dashboard were removed in an apparent effort to swap the public VIN plate.

When investigators inspected the [REDACTED] trailer, they noticed that the public facing VIN had been defaced, with pieces of the sticker on top of the trailer. Investigators located a confidential VIN and confirmed that the trailer was the same PJ trailer 3H412 stolen from [REDACTED] with the true VIN ending in [REDACTED].

Investigators obtained records from Mod Storage and learned that the space where the truck and trailer were recovered was rented using a fake Wyoming driver’s license and the alias “Armando Porras-Rodriguez.” This identification was listed to [REDACTED] Apartment [REDACTED], where Villanueva and Luzania lived, and a common address where Garibo would register vehicles.

Additional records from Mod Storage indicated that both Luzania and Garibo had access codes to the facility, and their entries into the property were tracked by an internal system. Importantly, the code associated to Luzania was used to access the storage space on September 7, 2023, and Garibo’s code was used to access an adjacent storage space during the same time

frame on that same date. In a later interview with law enforcement, Garibo admitted that he had been at the storage facility with Luzania and Villanueva and that the two tried to sell him the stolen trailer. (See Grand Jury Transcript, March 6, 2025, pages 147-165.)

COUNT FORTY-FOUR

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P

(Grand Jury Exhibit 3, Slides 67-69)

Between and including July 19, 2023 and December 21, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz**, and **Luis Enrique Villanueva-Gonzalez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or remove or altered or removed the vehicle identification number, and/or and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FORTY-FIVE

THEFT - \$5,000 - \$20,000, C.R.S. 18-4-401(1),(2)(H) [F5] 08A1F

(Grand Jury Exhibit 3, Slides 70-71)

On or about July 19, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Luis Enrique Villanueva-Gonzalez**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2020 black Workhorse flatbed trailer of _____, with the value of five thousand dollars or more but less than twenty thousand dollars, and intended to deprive _____ permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

COUNT FORTY-SIX

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 3, Slides 72-76)

Between and including July 19, 2023 and September 8, 2023, in the State of Colorado, **Alexis Gustavo Garibo-Meraz** and **Luis Enrique Villanueva-Gonzalez** unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of _____, and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours, and/or attempted to alter or remove or altered or removed the vehicle identification number, and/or and unlawfully attached or otherwise displayed in or upon the motor vehicle license plates other than those officially issued for the motor vehicle; in violation of section 18-4-409(3),(6)(b), C.R.S.

The offense alleged in Counts 44 through 46 committed in the following manner:

Between July 19, 2023, and July 20, 2023, a tan 2004 Chevrolet Silverado 2500, VIN _____, Utah license plate _____, valued at \$18,830 was stolen from _____ at her home at _____ Willard, Utah _____. The vehicle was recovered on December 21, 2023, in Garfield County bearing a fraudulent VIN _____ CO _____ after having been sold by Jose Armando Luzania-Martinez to an innocent buyer,

As part of the documentation obtained by law enforcement on Mod Storage space #1007 described above, investigators found that a vehicle with VIN ending in _____ was registered with space #1007. Investigators searched the VIN and found the vehicle was registered to _____ of Rifle, Garfield County, Colorado. Investigators contacted _____ and after inspecting the truck in his possession, learned that it was _____'s stolen Chevrolet Silverado 2500.

_____ informed law enforcement that he purchased the truck from Armando Luzania. Investigators learned from Villanueva's devices that he had a picture dated August 15, 2023, with a title for VIN ending in _____, as well as an image of what appeared to be a Mod Storage access code listing space 1007.

Additional communications from Villanueva's phone showed that on August 17, 2023, he texted a photograph of the VIN ending in _____ to a contact in his phone listed as "Flako." Flako was later suspected by law enforcement to be _____ . Flako responded that the "door sticker," which investigators believe to be referring to a falsified Nader Label, was ready.

Between July 19, 2023, and July 20, 2023, the same day as the theft of [redacted] s truck, a 2020 black workhorse flatbed trailer, VIN [redacted], Utah license plate [redacted], valued at \$5,000 was stolen from [redacted] at [redacted] Pleasant View, Utah. That trailer has not been recovered by law enforcement. Also on that date, a 2005 white Chevrolet Silverado 1500, VIN [redacted], Utah license plate [redacted], valued at \$6,533 was stolen from [redacted] at [redacted] Perry, Utah. The Silverado 1500 was recovered on September 8, 2023, at [redacted], Parachute, Colorado, bearing fraudulent VIN [redacted] and Colorado license plate [redacted].

On July 20, 2023, multiple license plate readers (LPRs) stationed on I-70 captured the [redacted] flatbed trailer as it was leaving Utah and entering Colorado. The associated photos from the LPR hits showed that the trailer, still bearing Utah license plate [redacted], was being towed by what appears to be the [redacted] s stolen Silverado 1500. The stolen truck appeared to have an unidentified but suspected stolen OHV atop the stolen trailer.

On September 8, 2023, law enforcement went to the parking lot at Parachute, Colorado. There, investigators found Wagner s stolen Silverado 1500, which was seized and a search warrant was later executed on the Silverado 1500. Upon inspecting the truck, law enforcement found that the public VIN had been replaced by a VIN ending in [redacted] and the vehicle was now bearing Colorado license plate [redacted]. Inside the truck, officers located an identification card with Villanueva s name on it. Upon inspection of Wagner s truck, investigators saw that the Nader label on the door was missing and that the public VIN plate and tire sticker appeared to have been tampered with. Inside the glove box, the VIN sticker had been removed leaving remnants of sticker adhesive still visible.

Further investigation revealed that the fraudulent VIN ending in [redacted] was obtained from a different Chevrolet Silverado owned by [redacted]. According to title records, Garibo and Villanueva obtained the [redacted] vehicle on April 23, 2023. A title application obtained by law enforcement shows that Garibo and Villanueva applied for and received a title for the VIN associated to the [redacted] truck on June 1, 2023. The two registered the VIN and received Colorado plates [redacted]. Three LPR hits between June and August 2023, showed the [redacted] plate had been attached to multiple different trucks including [redacted] s stolen Silverado.

During a subsequent interview with law enforcement, Garibo stated that the vehicle belonged to Villanueva. On Garibo s phone seized by law enforcement, investigators found a video showing the sticker with a VIN ending in [redacted] on a different truck prior to the theft. (See Grand Jury Transcript, March 6, 2025, pages 165-171; July 17, 2025, pages 14-39.)

COUNT FORTY-SEVEN

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A1G

(Grand Jury Exhibit 3, Slides 77-79)

Between and including August 12, 2023 and August 13, 2023, in the State of Colorado, **Luis Enrique Villanueva-Gonzalez** and **Luis Alverto Rodriguez-Reyna**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2023 black Polaris RZR Turbo R4 OHV of Adrenaline Driven Adventures, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive Adrenaline Driven Adventures permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

COUNT FORTY-EIGHT

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A1G

(Grand Jury Exhibit 3, Slides 77-79)

Between and including August 7, 2023 and August 13, 2023, in the State of Colorado, **Luis Enrique Villanueva-Gonzalez** and **Luis Alverto Rodriguez-Reyna**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2020 gray Polaris RZR Turbo S OHV of _____, with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive _____ permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offenses alleged in Counts 47 through 48 were committed in the following manner:

On August 12, 2023, a 2023 Black Polaris RZR Turbo R4, VIN _____, valued at \$39, 559, was stolen from Adrenaline Driven Adventures at _____, Grand Junction, Colorado . On August 7, 2023, a 2020 gray Polaris RZR Turbo S, VIN _____, valued at \$30,999, was stolen from _____ at _____ Glenwood Springs, Colorado . Both Polaris RZR OHVs were recovered on August 13, 2023, at Aardvark Storage _____ in Rifle, Colorado.

On August 13, 2023, a representative from Adrenaline Driven Adventures (“Adrenaline”) tracked an after-market GPS unit that was placed on the RZR Turbo R4 with VIN ending _____. The GPS showed that vehicle had traveled from Adrenaline’s facility to Aardvark Storage. Law enforcement responded to Aardvark Storage and located Adrenaline’s Polaris RZR in space 158

as well as [redacted]'s Polaris RZR in space 159. Records revealed that Villanueva rented both spaces under an alias "Luis Enrique Gonzalez." The manager at Aardvark storage confirmed to investigators that they rented spaces 158 and 159 to Villanueva. Adrenaline's Polaris RZR was located on a trailer that was found to be owned by Luis Alverto Rodriguez-Reyna. Investigators contacted Rodriguez-Reyna and inquired about ownership of the trailer. Rodriguez-Reyna then immediately reported the trailer stolen. Analysis of Garibo's phone showed contact with Rodriguez-Reyna and a discussion of RZR rims, undermining Rodriguez-Reyna's claim that his close associates stole his flatbed trailer. (See Grand Jury Transcript, July 17, 2025, pages 39-46.)

COUNT FORTY-NINE

MOTOR VEHICLE THEFT IN THE SECOND DEGREE, C.R.S. 18-4-409(3) [F4] 0804P
(Grand Jury Exhibit 3, Slides 80-83)

On or about May 24, 2024, in the State of Colorado, **Luis Enrique Villanueva-Gonzalez** and **Yuren Zamarron-Marquez**, unlawfully, feloniously, and knowingly obtained, exercised control over, received, or retained the motor vehicle of [redacted], and knew or reasonably should have known it was without authorization, or by threat or deception, and retained possession or control over the motor vehicle for more than twenty-four hours; in violation of section 18-4-409(3),(6)(b), C.R.S.

COUNT FIFTY

THEFT - \$20,000 - \$100,000, C.R.S. 18-4-401(1),(2)(H) [F4] 08A1G
(Grand Jury Exhibit 3, Slides 80-83)

On or about May 24, 2024, in the State of Colorado, **Luis Enrique Villanueva-Gonzalez** and **Yuren Zamarron-Marquez**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2018 black and gold Can-Am Maverick X3 XRS Turbo R OHV of [redacted], with the value of twenty thousand dollars or more but less than one hundred thousand dollars, and intended to deprive [redacted] permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

COUNT FIFTY-ONE

THEFT - \$2,000 - \$5,000, C.R.S. 18-4-401(1),(2)(F) [F6] 08A1E

(Grand Jury Exhibit 3, Slides 80-83)


On or about May 24, 2024, in the State of Colorado, **Luis Enrique Villanueva-Gonzalez and Yuren Zamarron-Marquez**, unlawfully, feloniously, and knowingly without authorization or by threat or deception, obtained, retained, or exercised control over; or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely: a 2012 black LDTL flatbed trailer of _____, with the value of two thousand dollars or more but less than five thousand dollars, and intended to deprive _____ permanently of its use or benefit; in violation of section 18-4-401(1)(a),(2)(h), C.R.S.

The offenses alleged in Counts 49 through 51 were committed in the following manner:

Between May 24, 2024, and May 25, 2024, a 1999 white Chevrolet Silverado, VIN _____, Colorado license plate _____ valued at \$8,000, was stolen from _____ at _____ Grand Junction, Colorado _____. On May 25, 2024, at approximately 1:00am, a 2018 black and gold CAN-AM Maverick X3 XRS Turbo R, _____, Utah license plate _____, valued at \$25,000, was stolen from _____ at _____, Clifton, Colorado _____. Between May 24, 2024, and May 25, 2024, a 2012 black LDTL Flatbed Trailer, VIN _____, Colorado license plate _____, valued at \$2,000 was stolen from _____ at _____, Clifton, Colorado _____. These three vehicles remain unrecovered.

On May 25, 2024, at 4:02 am, shortly after the thefts of the vehicles, Luis Villanueva and Yuren Zamarron-Marquez were captured on video possessing the stolen Chevrolet Silverado, CAN-AM and flatbed trailer as they purchased gas and entered the Maverick Gas Station at 240 Wagon Trail Road, Avon, Colorado. (See Grand Jury Transcript, July 17, 2025, pages 46-51.)


PHILIP J. WEISER
ATTORNEY GENERAL



JOHN STOCKLEY, Reg. No. 52496
Senior Assistant Attorney General
Criminal Justice Section

Subscribed and sworn before me in the City and County of Denver, State of Colorado, this
24th day of July, 2025.





NOTARY PUBLIC

SEAL

My commission expires: 12/25/2029

The 2024 – 2025 State Grand Jury presents the within Indictment, and the same is hereby
Ordered filed this 7th day of August, 2025.

Pursuant to C.R.S. 13073-107, the Court hereby designates the County of
Garfield, Colorado as the county of venue for the purposes of trial.



Christopher J. Baumann
Chief Judge
Second Judicial District

CHRISTOPHER J. BAUMANN
Chief Judge, Second Judicial District